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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDD H. AHRENS, an individual,

Plaintiff,

v.

Case No.: 2:15-cv-2034

COMPLAINT

(JURY TRIAL REQUESTED)

SUZETTE A. PECNICK, an individual;
WINDERMERE HOLDINGS GROUP
LIMITED, a company organized under
Seychelles law; KEEP2SHARE
CORPORATION, a corporation organized
under United Kingdom law; and ARTEM
SHEPELEV, an individual,

Defendants.

Plaintiff Edd H. Ahrens (“Plaintiff” or “Mr. Ahrens”), by and through his counsel, GIBSON & TREU LLP, complains and alleges as follows against Defendants Suzette A. Pecnick (“Ms. Pecnick”), Windermere Holdings Group Limited (“Windermere”), Keep2Share Corporation (“KS”), and Artem Shepelev (“Mr. Shepelev”) (collectively “Defendants”), on information and belief, that the following are and have been true at all time relevant to this lawsuit unless otherwise indicated specifically to the contrary:

NATURE OF ACTION

1. This is an action for direct and contributory copyright infringement under 17 U.S.C. § 501, false designation of origin under 15 U.S.C. § 1125(a), misappropriation of commercial properties under Nevada common law, and unjust enrichment under Nevada common law.

2. Defendants individually and collectively infringed Mr. Ahrens' copyrights and service marks, and misappropriated Mr. Ahrens' commercial properties, all as identified more specifically herein (such copyrights, marks, and commercial properties collectively "Mr. Ahrens' Intellectual Property"), and/or contributed to such infringement.

PARTIES

3. Mr. Ahrens is an individual whose principal residence is in the State of Nevada.

4. Ms. Pecnick is an individual whose principal residence is in the State of Florida.

5. Windermere is a company organized under the laws of the Seychelles.

6. KS is a corporation organized under the laws of the United Kingdom.

7. Mr. Shepelev is an individual residing in Russia.

JURISDICTION

8. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9. This Court has original jurisdiction over Plaintiff's First through Two Hundred Eighty-First Causes of Action (inclusive) (the "Federal Law Causes of Action") pursuant to 28 U.S.C. § 1338 because the Federal Law Causes of Action arise under the Copyright Act and the Lanham Act.

10. This Court has supplemental jurisdiction over Plaintiff's Two Hundred Eighty-Second through Two Hundred Eighty-Ninth Causes of Action (inclusive) (the "State Law Causes of Action") pursuant to 28 U.S.C. § 1367 because the State Law Causes of Action are so related to the Federal Law Causes of Action as to form part of the same case or controversy as the Federal Law Causes of Action pursuant to Article III of the United States Constitution.

11. Mr. Ahrens is a citizen of Nevada.

12. Ms. Pecnick is a citizen of Florida.

1 13. Windermere is a Seychelles entity.

2 14. KS is a United Kingdom entity.

3 15. Mr. Shepelev is a resident of Russia.

4 16. Mr. Ahrens created the copyrighted works that constitute part of Mr. Ahrens'
5 Intellectual Property ("Mr. Ahrens' Published Work") in Nevada.

6 17. Mr. Ahrens published Mr. Ahrens' Published Work from Nevada.

7 18. Mr. Ahrens' principal place of business from which Mr. Ahrens provides services
8 under service marks owned by Mr. Ahrens is in Nevada.

9 19. Mr. Ahrens is the owner of the World Wide Web domains pregnantusa.com and
10 justnips.com ("Mr. Ahrens' Domains").

11 20. Mr. Ahrens created all of Mr. Ahrens' commercial properties, including, without
12 limitation, all content reposed at Mr. Ahrens' Domains (collectively "Mr. Ahrens' Commercial
13 Properties") in Nevada.

14 21. Mr. Ahrens makes Mr. Ahrens' Commercial Properties available to the public from
15 Nevada.

16 22. Windermere, KS, and Mr. Shepelev knew or had reason to know that the source of
17 some or all of Mr. Ahrens' Intellectual Property was the United States, because Mr. Ahrens
18 publishes and uses in commerce Mr. Ahrens' Intellectual Property on World Wide Web sites
19 reposed at Mr. Ahrens' Domains (such content and domain names collectively "Mr. Ahrens'
20 Websites"), and the content of Mr. Ahrens' Websites conspicuously indicates that Mr. Ahrens is
21 located in, and operates those sites from, Las Vegas, Nevada, in the United States.

22 23. Ms. Pecnick knew or had reason to know that the source of some or all of Mr.
23 Ahrens' Intellectual Property was the State of Nevada, because the content of Mr. Ahrens'
24 Websites conspicuously indicates that Mr. Ahrens is located in, and operates those sites from,
25 Las Vegas, Nevada.

26 24. Windermere, KS, and Mr. Shepelev knew or had reason to know that the source of
27 some or all of Mr. Ahrens' Intellectual Property was the United States, because all of the visual
28 and audiovisual works comprising a subset of Mr. Ahrens' Published Work (such visual and

1 audiovisual works collectively “Mr. Ahrens’ Visual Works”) displayed without permission by
2 Windermere, KS, and Mr. Shepelev depicts the name of at least one of Mr. Ahrens’ Websites
3 and thus enabled Windermere, KS, and Mr. Shepelev to locate and view the content of Mr.
4 Ahrens’ Websites identifying the source of same.

5 25. Ms. Pecnick knew or had reason to know that the source of some or all of Mr.
6 Ahrens’ Intellectual Property was the State of Nevada, because all of Mr. Ahrens’ Visual Work
7 displayed without permission by Ms. Pecnick depicts the name of at least one of Mr. Ahrens’
8 Websites and thus enabled Ms. Pecnick to locate and view the content of Mr. Ahrens’ Websites
9 identifying the source of same.

10 26. Windermere, KS, and Mr. Shepelev knew or had reason to know that the source of
11 some or all of Mr. Ahrens’ Intellectual Property was the United States, because, given that
12 neither Windermere, nor KS, nor Mr. Shepelev is the author of any of Mr. Ahrens’ Published
13 Work, and that each one of Mr. Ahrens’ Visual Works depicts the name of at least one of Mr.
14 Ahrens’ Websites, a good-faith determination of non-infringement required visiting at least one
15 of Mr. Ahrens’ Websites to ascertain such visual work’s authorship and obtain authorization for
16 such work’s use.

17 27. Ms. Pecnick knew or had reason to know that the source of some or all of Mr.
18 Ahrens’ Intellectual Property was the United States, because, given that Ms. Pecnick is not the
19 author of any of Mr. Ahrens’ Published Work, and that each one of Mr. Ahrens’ Visual Works is
20 depicts the name of at least one of Mr. Ahrens’ Websites, a good-faith determination of non-
21 infringement required visiting at least one of Mr. Ahrens’ Websites to ascertain such visual
22 work’s authorship and obtain authorization for such work’s use.

23 28. Windermere, KS, and Mr. Shepelev knew or had reason to know that the source of
24 some or all of Mr. Ahrens’ Intellectual Property was the United States, because the terms of use
25 for Mr. Ahrens’ Websites specify that Nevada law governs those terms of use and that the venue
26 for any litigation concerning those terms of use shall be in Clark County, Nevada, in the United
27 States.

1 29. Ms. Pecnick knew or had reason to know that the source of some or all of Mr.
2 Ahrens' Intellectual Property was the State of Nevada, because the terms of use for Mr. Ahrens'
3 Websites specify that Nevada law governs those terms of use and that the venue for any litigation
4 concerning those terms of use shall be in Clark County, Nevada.

5 30. Because Windermere, KS, and Mr. Shepelev knew or had reason to know that the
6 source of some or all of Mr. Ahrens' Intellectual Property was the United States, Windermere,
7 KS, and Mr. Shepelev knew that Windermere's, KS's, and Mr. Shepelev's infringement and
8 misappropriation would cause Mr. Ahrens damage in the United States.

9 31. Because Ms. Pecnick knew or had reason to know that the source of some or all of
10 Mr. Ahrens' Intellectual Property was the State of Nevada, Ms. Pecnick knew that Ms. Pecnick's
11 infringement and misappropriation would cause Ms. Pecnick damage in the State of Nevada

12 32. Windermere knew or had reason to know that Defendant Windermere's infringement
13 and misappropriation of Mr. Ahrens' Intellectual Property would cause Mr. Ahrens damage in
14 the United States, because on or about March 17, 2015, Mr. Ahrens sent written notice to
15 Windermere informing Windermere of copyright infringement with respect to a subset of Mr.
16 Ahrens' Intellectual Property and providing Mr. Ahrens' physical address in Las Vegas, Nevada
17 (the "Windermere Notice").

18 33. Ms. Pecnick knew or had reason to know that Ms. Pecnick's infringement and
19 misappropriation of Mr. Ahrens' Intellectual Property would cause Mr. Ahrens in the State of
20 Nevada, because Ms. Pecnick has, and at a minimum has had, substantial administrative control
21 over the World Wide Web site reposed at the domain planetsuzy.org (such site and domain name
22 collectively the "Planetsuzy Website") such that Ms. Pecnick must have known or had reason to
23 know of the existence and contents of the Windermere Notice.

24 34. KS knew or had reason to know that KS's infringement and misappropriation of Mr.
25 Ahrens' Intellectual Property would cause Mr. Ahrens damage in the United States, because on
26 or about March 16, 2015, Mr. Ahrens sent written notice to Defendant KS informing KS of
27 copyright infringement with respect to a subset of Mr. Ahrens' Intellectual Property and
28 providing Mr. Ahrens' physical address in Las Vegas, Nevada (the "KS Notice").

1 43. Mr. Ahrens is the owner of the copyright in the literary work entitled “Daria & Flora
2 0591 Enticement Preview” (the “Copyrighted Work No. 7”), a copy of the application for
3 registration of which is attached hereto as Exhibit 7.

4 44. Mr. Ahrens is the owner of the copyright in the literary work entitled “Diesel 0712
5 Enticement Preview” (the “Copyrighted Work No. 8”), a copy of the application for registration
6 of which is attached hereto as Exhibit 8.

7 45. Mr. Ahrens is the owner of the copyright in the literary work entitled “Dorian 0581
8 Enticement Preview” (the “Copyrighted Work No. 9”), a copy of the application for registration
9 of which is attached hereto as Exhibit 9.

10 46. Mr. Ahrens is the owner of the copyright in the literary work entitled “Electra 0590
11 Enticement Preview” (the “Copyrighted Work No. 10”), a copy of the application for registration
12 of which is attached hereto as Exhibit 10.

13 47. Mr. Ahrens is the owner of the copyright in the literary work entitled “Gemma 0675
14 Enticement Preview” (the “Copyrighted Work No. 11”), a copy of the application for registration
15 of which is attached hereto as Exhibit 11.

16 48. Mr. Ahrens is the owner of the copyright in the literary work entitled “Georgina
17 0608 Enticement Preview” (the “Copyrighted Work No. 12”), a copy of the application for
18 registration of which is attached hereto as Exhibit 12.

19 49. Mr. Ahrens is the owner of the copyright in the literary work entitled “Hazel 0549
20 Enticement Preview” (the “Copyrighted Work No. 13”), a copy of the application for registration
21 of which is attached hereto as Exhibit 13.

22 50. Mr. Ahrens is the owner of the copyright in the literary work entitled “Jessica
23 Johnson 0678 Enticement Preview” (the “Copyrighted Work No. 14”), a copy of the application
24 for registration of which is attached hereto as Exhibit 14.

25 51. Mr. Ahrens is the owner of the copyright in the literary work entitled “Juliet 0773
26 Enticement Preview” (the “Copyrighted Work No. 15”), a copy of the application for registration
27 of which is attached hereto as Exhibit 15.

1 52. Mr. Ahrens is the owner of the copyright in the literary work entitled “Karen V 0587
2 Enticement Preview” (the “Copyrighted Work No. 16”), a copy of the application for registration
3 of which is attached hereto as Exhibit 16.

4 53. Mr. Ahrens is the owner of the copyright in the literary work entitled “Kenna Kane
5 0657 Enticement Preview” (the “Copyrighted Work No. 17”), a copy of the application for
6 registration of which is attached hereto as Exhibit 17.

7 54. Mr. Ahrens is the owner of the copyright in the literary work entitled “Leila 0592
8 Enticement Preview” (the “Copyrighted Work No. 18”), a copy of the application for registration
9 of which is attached hereto as Exhibit 18.

10 55. Mr. Ahrens is the owner of the copyright in the literary work entitled “Marilyn M
11 0649 Enticement Preview” (the “Copyrighted Work No. 19”), a copy of the application for
12 registration of which is attached hereto as Exhibit 19.

13 56. Mr. Ahrens is the owner of the copyright in the literary work entitled “Milena 0653
14 Enticement Preview” (the “Copyrighted Work No. 20”), a copy of the application for registration
15 of which is attached hereto as Exhibit 20.

16 57. Mr. Ahrens is the owner of the copyright in the literary work entitled “Nicki W 0725
17 Enticement Preview” (the “Copyrighted Work No. 21”), a copy of the application for registration
18 of which is attached hereto as Exhibit 21.

19 58. Mr. Ahrens is the owner of the copyright in the literary work entitled “Nirvana 0576
20 Enticement Preview” (the “Copyrighted Work No. 22”), a copy of the application for registration
21 of which is attached hereto as Exhibit 22.

22 59. Mr. Ahrens is the owner of the copyright in the literary work entitled “Paris 0720
23 Enticement Preview” (the “Copyrighted Work No. 23”), a copy of the application for registration
24 of which is attached hereto as Exhibit 23.

25 60. Mr. Ahrens is the owner of the copyright in the literary work entitled “Sara R 0544
26 Enticement Preview” (the “Copyrighted Work No. 24”), a copy of the application for registration
27 of which is attached hereto as Exhibit 24.

1 61. Mr. Ahrens is the owner of the copyright in the literary work entitled “Sarah Niley
2 0752 Enticement Preview” (the “Copyrighted Work No. 25”), a copy of the application for
3 registration of which is attached hereto as Exhibit 25.

4 62. Mr. Ahrens is the owner of the copyright in the literary work entitled “Sexy Roxy
5 0735 Enticement Preview” (the “Copyrighted Work No. 26”), a copy of the application for
6 registration of which is attached hereto as Exhibit 26.

7 63. Mr. Ahrens is the owner of the copyright in the literary work entitled “Veronika
8 Daniels 0563 Enticement Preview” (the “Copyrighted Work No. 27”), a copy of the application
9 for registration of which is attached hereto as Exhibit 27.

10 64. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Bonni
11 Blaze 0575” (the “Copyrighted Work No. 28”), with respect to which the USCO issued
12 registration number PA 1-957-135 effective September 28, 2015; a copy of the certificate
13 evidencing that registration is attached hereto as Exhibit 28.

14 65. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Sara R
15 0544” (the “Copyrighted Work No. 29”), with respect to which the USCO issued registration
16 number PA 1-957-749 effective October 2, 2015; a copy of the certificate evidencing that
17 registration is attached hereto as Exhibit 29.

18 66. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Juliet
19 0773” (the “Copyrighted Work No. 30”), with respect to which the USCO issued registration
20 number PA 1-957-750 effective October 2, 2015; a copy of the certificate evidencing that
21 registration is attached hereto as Exhibit 30.

22 67. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Gemma
23 0675” (the “Copyrighted Work No. 31”), with respect to which the USCO issued registration
24 number PA 1-957-798 effective October 2, 2015; a copy of the certificate evidencing that
25 registration is attached hereto as Exhibit 31.

26 68. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Hazel
27 0549” (the “Copyrighted Work No. 32”), with respect to which the USCO issued registration
28

1 number PA 1-957-117 effective September 28, 2015; a copy of the certificate evidencing that
2 registration is attached hereto as Exhibit 32.

3 69. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Daria &
4 Flora 0591” (the “Copyrighted Work No. 33”), with respect to which the USCO issued
5 registration number PA 1-957-805 effective October 2, 2015; a copy of the certificate evidencing
6 that registration is attached hereto as Exhibit 33.

7 70. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Daphne
8 0623” (the “Copyrighted Work No. 34”), with respect to which the USCO issued registration
9 number PA 1-957-126 effective September 28, 2015; a copy of the certificate evidencing that
10 registration is attached hereto as Exhibit 34.

11 71. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Dani
12 Storm 0690” (the “Copyrighted Work No. 35”), with respect to which the USCO issued
13 registration number PA 1-957-121 effective September 28, 2015; a copy of the certificate
14 evidencing that registration is attached hereto as Exhibit 35.

15 72. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Marilyn
16 M 0649” (the “Copyrighted Work No. 36”), with respect to which the USCO issued registration
17 number PA 1-957-758 effective October 2, 2015; a copy of the certificate evidencing that
18 registration is attached hereto as Exhibit 36.

19 73. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Leila
20 0592” (the “Copyrighted Work No. 37”), with respect to which the USCO issued registration
21 number PA 1-957-763 effective October 2, 2015; a copy of the certificate evidencing that
22 registration is attached hereto as Exhibit 37.

23 74. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Kenna
24 Kane 0657” (the “Copyrighted Work No. 38”), with respect to which the USCO issued
25 registration number PA 1-957-802 effective October 2, 2015; a copy of the certificate evidencing
26 that registration is attached hereto as Exhibit 38.

27 75. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Karen V
28 0587” (the “Copyrighted Work No. 39”), with respect to which the USCO issued registration

1 number PA 1-957-133 effective September 28, 2015; a copy of the certificate evidencing that
2 registration is attached hereto as Exhibit 39.

3 76. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Caramel
4 0459” (the “Copyrighted Work No. 40”), with respect to which the USCO issued registration
5 number PA 1-957-797 effective October 2, 2015; a copy of the certificate evidencing that
6 registration is attached hereto as Exhibit 40.

7 77. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Harmony
8 0300” (the “Copyrighted Work No. 41”), with respect to which the USCO issued registration
9 number PA 1-957-796 effective October 2, 2015; a copy of the certificate evidencing that
10 registration is attached hereto as Exhibit 41.

11 78. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Gretchen
12 0353” (the “Copyrighted Work No. 42”), with respect to which the USCO issued registration
13 number PA 1-957-116 effective September 28, 2015; a copy of the certificate evidencing that
14 registration is attached hereto as Exhibit 42.

15 79. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Fannie
16 0357” (the “Copyrighted Work No. 43”), with respect to which the USCO issued registration
17 number PA 1-957-115 effective September 28, 2015; a copy of the certificate evidencing that
18 registration is attached hereto as Exhibit 43.

19 80. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Jessica
20 Johnson 0678” (the “Copyrighted Work No. 44”), with respect to which the USCO issued
21 registration number PA 1-957-803 effective October 2, 2015; a copy of the certificate evidencing
22 that registration is attached hereto as Exhibit 44.

23 81. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Diesel
24 0712” (the “Copyrighted Work No. 45”), with respect to which the USCO issued registration
25 number PA 1-957-119 effective September 28, 2015; a copy of the certificate evidencing that
26 registration is attached hereto as Exhibit 45.

27 82. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Blinkky
28 0654” (the “Copyrighted Work No. 46”), with respect to which the USCO issued registration

1 number PA 1-957-762 effective October 2, 2015; a copy of the certificate evidencing that
2 registration is attached hereto as Exhibit 46.

3 83. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Nirvana
4 0576” (the “Copyrighted Work No. 47”), with respect to which the USCO issued registration
5 number PA 1-957-118 effective September 28, 2015; a copy of the certificate evidencing that
6 registration is attached hereto as Exhibit 47.

7 84. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Shawnie
8 0437” (the “Copyrighted Work No. 48”), with respect to which the USCO issued registration
9 number PA 1-957-753 effective October 2, 2015; a copy of the certificate evidencing that
10 registration is attached hereto as Exhibit 48.

11 85. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Paris
12 0720” (the “Copyrighted Work No. 49”), with respect to which the USCO issued registration
13 number PA 1-957-754 effective October 2, 2015; a copy of the certificate evidencing that
14 registration is attached hereto as Exhibit 49.

15 86. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Electra
16 0590” (the “Copyrighted Work No. 50”), with respect to which the USCO issued registration
17 number PA 1-957-756 effective October 2, 2015; a copy of the certificate evidencing that
18 registration is attached hereto as Exhibit 50.

19 87. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Dorian
20 0581” (the “Copyrighted Work No. 51”), with respect to which the USCO issued registration
21 number PA 1-957-759 effective October 2, 2015; a copy of the certificate evidencing that
22 registration is attached hereto as Exhibit 51.

23 88. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Nikki W
24 0725” (the “Copyrighted Work No. 52”), with respect to which the USCO issued registration
25 number PA 1-957-800 effective October 2, 2015; a copy of the certificate evidencing that
26 registration is attached hereto as Exhibit 52.

27 89. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Veronika
28 Daniels 0563” (the “Copyrighted Work No. 53”), with respect to which the USCO issued

1 registration number PA 1-957-799 effective October 2, 2015; a copy of the certificate evidencing
2 that registration is attached hereto as Exhibit 53.

3 90. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Georgina
4 0608” (the “Copyrighted Work No. 54”), with respect to which the USCO issued registration
5 number PA 1-957-766 effective October 2, 2015; a copy of the certificate evidencing that
6 registration is attached hereto as Exhibit 54.

7 91. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Kendra
8 Banx 0398” (the “Copyrighted Work No. 55”), with respect to which the USCO issued
9 registration number PA 1-957-765 effective October 2, 2015; a copy of the certificate evidencing
10 that registration is attached hereto as Exhibit 55.

11 92. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Milena
12 0653” (the “Copyrighted Work No. 56”), with respect to which the USCO issued registration
13 number PA 1-957-764 effective October 2, 2015; a copy of the certificate evidencing that
14 registration is attached hereto as Exhibit 56.

15 93. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Sophia
16 0802” (the “Copyrighted Work No. 57”), with respect to which the USCO issued registration
17 number PA 1-957-087 effective September 28, 2015; a copy of the certificate evidencing that
18 registration is attached hereto as Exhibit 57.

19 94. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Yoa
20 0645” (the “Copyrighted Work No. 58”), with respect to which the USCO issued registration
21 number PA 1-957-085 effective September 28, 2015; a copy of the certificate evidencing that
22 registration is attached hereto as Exhibit 58.

23 95. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Venus
24 Sky 0788” (the “Copyrighted Work No. 59”), with respect to which the USCO issued
25 registration number PA 1-957-083 effective September 28, 2015; a copy of the certificate
26 evidencing that registration is attached hereto as Exhibit 59.

27 96. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Sexy
28 Roxy 0735” (the “Copyrighted Work No. 60”), with respect to which the USCO issued

1 registration number PA 1-957-079 effective September 28, 2015; a copy of the certificate
2 evidencing that registration is attached hereto as Exhibit 60.

3 97. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Sativa
4 0663” (the “Copyrighted Work No. 61”), with respect to which the USCO issued registration
5 number PA 1-957-075 effective September 28, 2015; a copy of the certificate evidencing that
6 registration is attached hereto as Exhibit 61.

7 98. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Sara
8 Niley 0752” (the “Copyrighted Work No. 62”), with respect to which the USCO issued
9 registration number PA 1-957-067 effective September 28, 2015; a copy of the certificate
10 evidencing that registration is attached hereto as Exhibit 62.

11 99. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Renee
12 0539” (the “Copyrighted Work No. 63”), with respect to which the USCO issued registration
13 number PA 1-957-064 effective September 28, 2015; a copy of the certificate evidencing that
14 registration is attached hereto as Exhibit 63.

15 100. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Renee
16 0830” (the “Copyrighted Work No. 64”), with respect to which the USCO issued registration
17 number PA 1-957-063 effective September 28, 2015; a copy of the certificate evidencing that
18 registration is attached hereto as Exhibit 64.

19 101. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Renee
20 0809” (the “Copyrighted Work No. 65”), with respect to which the USCO issued registration
21 number PA 1-957-062 effective September 28, 2015; a copy of the certificate evidencing that
22 registration is attached hereto as Exhibit 65.

23 102. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Skye
24 0556” (the “Copyrighted Work No. 66”), with respect to which the USCO issued registration
25 number PA 1-957-061 effective September 28, 2015; a copy of the certificate evidencing that
26 registration is attached hereto as Exhibit 66.

27 103. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Silvana
28 0666A” (the “Copyrighted Work No. 67”), with respect to which the USCO issued registration

1 number PA 1-957-060 effective September 28, 2015; a copy of the certificate evidencing that
2 registration is attached hereto as Exhibit 67.

3 104. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Silvana
4 0666B” (the “Copyrighted Work No. 68”), with respect to which the USCO issued registration
5 number PA 1-957-058 effective September 28, 2015; a copy of the certificate evidencing that
6 registration is attached hereto as Exhibit 68.

7 105. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Shy
8 0631” (the “Copyrighted Work No. 69”), with respect to which the USCO issued registration
9 number PA 1-957-057 effective September 28, 2015; a copy of the certificate evidencing that
10 registration is attached hereto as Exhibit 69.

11 106. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Renee &
12 Alicia 0548” (the “Copyrighted Work No. 70”), with respect to which the USCO issued
13 registration number PA 1-957-055 effective September 28, 2015; a copy of the certificate
14 evidencing that registration is attached hereto as Exhibit 70.

15 107. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Precious
16 0751” (the “Copyrighted Work No. 71”), with respect to which the USCO issued registration
17 number PA 1-957-054 effective September 28, 2015; a copy of the certificate evidencing that
18 registration is attached hereto as Exhibit 71.

19 108. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Precious
20 0756” (the “Copyrighted Work No. 72”), with respect to which the USCO issued registration
21 number PA 1-957-053 effective September 28, 2015; a copy of the certificate evidencing that
22 registration is attached hereto as Exhibit 72.

23 109. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Pantera
24 0821” (the “Copyrighted Work No. 73”), with respect to which the USCO issued registration
25 number PA 1-957-052 effective September 28, 2015; a copy of the certificate evidencing that
26 registration is attached hereto as Exhibit 73.

27 110. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Nicki S.
28 0578” (the “Copyrighted Work No. 74”), with respect to which the USCO issued registration

1 number PA 1-957-051 effective September 28, 2015; a copy of the certificate evidencing that
2 registration is attached hereto as Exhibit 74.

3 111. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Tasty
4 0711” (the “Copyrighted Work No. 75”), with respect to which the USCO issued registration
5 number PA 1-957-596 effective October 2, 2015; a copy of the certificate evidencing that
6 registration is attached hereto as Exhibit 75.

7 112. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Renee
8 0837” (the “Copyrighted Work No. 76”), a copy of the application for registration of which is
9 attached hereto as Exhibit 76.

10 113. Mr. Ahrens is the owner of the copyright in the audiovisual work entitled “Cereena
11 0769” (the “Copyrighted Work No. 77”), with respect to which the USCO issued registration
12 number PA 1-957-047 effective September 28, 2015; a copy of the certificate evidencing that
13 registration is attached hereto as Exhibit 77.

14 114. Copyrighted Works Numbers 1 through 77 are each the subject of either a United
15 States copyright registration or a pending application with the USCO for copyright registration.

16 115. The Copyrighted Works constitute copyrightable subject matter pursuant to 17
17 U.S.C. § 102.

18 116. The Copyrighted Works include audiovisual motion pictures, individual frames of
19 audiovisual motion pictures, and literary compositions.

20 117. Mr. Ahrens produced each of the Copyrighted Works with the intent to offer licenses
21 to view one or more of the Copyrighted Works commercially to paying clients for profit.

22 118. Mr. Ahrens is the owner of the common-law service mark PREGNANTUSA.COM.

23 119. Mr. Ahrens is the owner of the common-law service mark JUSTNIPS.COM
24 (collectively with PREGNANTUSA.COM, “Mr. Ahrens’ Marks”).

25 120. Starting on or about September 11, 2003 and continuing to the present, Mr. Ahrens
26 has produced artistic works visually depicting nude models and literary works describing in
27 prose form the content of those artistic works.

1 121. Starting on or about May 12, 2007 and continuing to the present, Mr. Ahrens made
2 available to the public content reposed at the domains pregnantusa.com (such content and
3 domain name collectively the “Pregnantusa.com Website”) and justnips.com (such content and
4 domain name collectively the “Justnips.com Website”).

5 122. Mr. Ahrens promotes Copyrighted Works and sells licenses to view Copyrighted
6 Works through the Pregnantusa.com Website and the Justnips.com Website.

7 123. In the publicly available online source domaintools.whois.com, which provides
8 information regarding owners and other contact persons with respect to domain names,
9 Windermere is currently identified as the registrant of the domain planetsuzy.org.

10 124. As the registrant, Windermere is at least one owner of the domain planetsuzy.org.

11 125. As the sole or joint owner of the domain planetsuzy.org, Windermere has ultimate
12 control of the content displayed at the planetsuzy.org domain

13 126. In the publicly available online source who.is, which provides information regarding
14 owners and other contact persons with respect to domain names, “Suzette Pecnick” is currently
15 identified as the owner of the domain planetsuzy.org.

16 127. In the publicly available online source alexa.com, which provides information
17 regarding owners and other contact persons with respect to domain names, “Suzette Pecnick” is
18 currently identified as the lead contact person with respect to the domain planetsuzy.org.

19 128. *Suzy* is a common nickname for the given name “Suzette.”

20 129. As the sole or joint owner of the domain planetsuzy.org, or at a minimum the holder
21 of administrative authority with respect to the domain planetsuzy.org, Ms. Pecnick has ultimate
22 control of the content displayed at the planetsuzy.org domain.

23 130. The Planetsuzy Website is an online forum on which anyone, upon applying for
24 registration through the Planetsuzy Website, can submit content for display on and/or through the
25 website.

26 131. The USCO has no record of a Digital Millennium Copyright Act (“DMCA”) agent
27 for receipt of takedown notices with respect to the Planetsuzy Website as of October 13, 2015.

1 132. The USCO has no record of a DMCA agent for receipt of takedown notices with
2 respect to Windermere as of October 13, 2015.

3 133. The USCO has no record of a DMCA agent for receipt of takedown notices with
4 respect to KS as of October 13, 2015.

5 134. The USCO has no record of a DMCA agent for receipt of takedown notices with
6 respect to Mr. Shepelev as of October 13, 2015.

7 135. The USCO has no record of a DMCA agent for receipt of takedown notices with
8 respect to any entity with a name resembling “threepicture.com” as of October 13, 2015.

9 136. There is no information on the website reposted at the domain threepicture.com
10 (collectively with the domain name threepicture.com, the “Threepicture Website”) providing
11 contact information for an agent for receipt of takedown notices under the Digital Millennium
12 Copyright Act.

13 137. Mr. Shepelev is the registrant of the domain threepicture.com.

14 138. As the registrant, Mr. Shepelev is the owner of the domain threepicture.com.

15 139. As the owner of the domain threepicture.com, Mr. Shepelev has ultimate control of
16 the content displayed at the threepicture.com domain.

17 140. The Planetsuzy Website owners designate Mr. Shepelev, by way of the Threepicture
18 Website, as an approved vendor for purposes of hosting Planetsuzy Website users’ image content
19 for later access by other Planetsuzy Website users.

20 141. As a Planetsuzy Website host, Mr. Shepelev, by way of the Threepicture Website,
21 permits Planetsuzy Website users to upload content to the Threepicture Website.

22 142. Through the mechanism of “framing,” content that has been uploaded to the
23 Threepicture Website are published by Mr. Shepelev, by way of the Threepicture Website, to
24 Planetsuzy Website users viewing that content.

25 143. Mr. Shepelev, Windermere, and Ms. Pecnick derive financial gain from Mr.
26 Shepelev’s activity, by way of the Threepicture Website, as a Planetsuzy Website host.

27 144. The Planetsuzy Website owners designate KS as an approved vendor for purposes of
28 hosting Planetsuzy Website users’ content for later access by other Planetsuzy Website users.

1 145. As a Planetsuzy Website host, KS permits Planetsuzy Website users to upload
2 content to the KS Website.

3 146. Planetsuzy Website users wishing to see content referenced on the Planetsuzy
4 Website and hosted on the KS Website can obtain access to, and ultimately download, that
5 content from the KS Website.

6 147. KS, Windermere, and Ms. Pecnick derive financial gain from KS's activity as a
7 Planetsuzy Website host.

8 148. The content displayed on the Planetsuzy Website is of an adult-oriented nature
9 related, in pertinent part, to nude female models.

10 149. On the Planetsuzy Website appear multiple conspicuous representations that the
11 Planetsuzy Website is a source for users to obtain and view adult-oriented content free of charge.

12 150. Windermere gains a financial benefit through the display of third-party
13 advertisements on the Planetsuzy Website.

14 151. Ms. Pecnick gains a financial benefit through the display of third-party
15 advertisements on the Planetsuzy Website.

16 152. KS gains a financial benefit through the acquisition of viewers directed to the
17 website reposed at keep2share.cc (such website, collectively with the domain name
18 keep2share.cc, the "KS Website") as a result of the KS Infringement Enablement.

19 153. Mr. Shepelev gains a financial benefit through the acquisition of viewers directed to
20 the Threepicture Website as a result of the Threepicture Infringement Enablement.

21 154. Since each one of Mr. Ahrens' Visual Works depicts one or more of Mr. Ahrens'
22 Marks, Windermere's display of Mr. Ahrens' Visual Works via the Planetsuzy Website
23 constitutes use of Mr. Ahrens' Marks in commerce as designations of origin of Windermere's
24 services.

25 155. Ms. Pecnick's display of Mr. Ahrens' Visual Works via the Planetsuzy Website
26 constitutes use of Mr. Ahrens' Marks in commerce as designations of origin of Ms. Pecnick's
27 services.

1 156. Mr. Shepelev's display of Mr. Ahrens' Visual Works via the Threepicture Website
2 constitutes use of Mr. Ahrens' Marks in commerce as designations of origin of Mr. Shepelev's
3 services.

4 157. Mr. Shepelev's display of Mr. Ahrens' Visual Works via embedding on the
5 Planetsuzy Website constitutes use of Mr. Ahrens' Marks in commerce as designations of origin
6 of Mr. Shepelev's services.

7 158. KS's display of Mr. Ahrens' Visual Works via the KS Website constitutes use of Mr.
8 Ahrens' Marks in commerce as designations of origin of KS's services.

9 159. Windermere never sought permission to display, copy, or distribute any of Mr.
10 Ahrens' Published Work.

11 160. Ms. Pecnick never sought permission to display, copy, or distribute any of Mr.
12 Ahrens' Published Work.

13 161. KS never sought permission to copy or distribute any of Mr. Ahrens' Published
14 Work.

15 162. Mr. Shepelev never sought permission to display, copy, or distribute any of Mr.
16 Ahrens' Published Work.

17 163. Windermere never sought permission to use Mr. Ahrens' Marks in commerce as
18 designations of origin of services.

19 164. Ms. Pecnick never sought permission to use Mr. Ahrens' Marks in commerce as
20 designations of origin of services.

21 165. KS never sought permission to use Mr. Ahrens' Marks in commerce as designations
22 of origin of services.

23 166. Mr. Shepelev never sought permission to use Mr. Ahrens' Marks in commerce as
24 designations of origin of services.

25 167. Windermere never provided Mr. Ahrens with any payment or consideration for
26 Windermere's display or distribution of any of the Copyrighted Works.

27 168. Windermere never procured from Mr. Ahrens any written assignment of any of Mr.
28 Ahrens' rights in and to any of the Copyrighted Works.

1 169. Ms. Pecnick never provided Mr. Ahrens with any payment or consideration for Ms.
2 Pecnick's display or distribution of any of the Copyrighted Works.

3 170. Ms. Pecnick never procured from Mr. Ahrens any written assignment of any of Mr.
4 Ahrens' rights in and to any of the Copyrighted Works.

5 171. KS never provided Mr. Ahrens with any payment or consideration for KS's display
6 or distribution of any of the Copyrighted Works.

7 172. KS never procured from Mr. Ahrens any written assignment of any of Mr. Ahrens'
8 rights in and to any of the Copyrighted Works.

9 173. Mr. Shepelev never provided Mr. Ahrens with any payment or consideration for Mr.
10 Shepelev's display or distribution of any of the Copyrighted Works.

11 174. Mr. Shepelev never procured from Mr. Ahrens any written assignment of any of Mr.
12 Ahrens' rights in and to any of the Copyrighted Works.

13 175. Mr. Ahrens has never assigned, sold, transferred or conveyed to anyone any of Mr.
14 Ahrens' exclusive rights, including, without limitation, copyrights, in and to any of the
15 Copyrighted Works, or in and to any of Mr. Ahrens' Commercial Properties.

16 176. Under no circumstances would Mr. Ahrens have granted permission to any of the
17 Defendants to transfer any rights to the Copyrighted Works under circumstances whereby Mr.
18 Ahrens would not be entitled to participate in the ongoing economic benefit of any commercial
19 exploitation of the Copyrighted Works or of Mr. Ahrens' Commercial Properties.

20 177. Mr. Ahrens has never assigned, sold, transferred, licensed or conveyed any of Mr.
21 Ahrens' rights in and to any of Mr. Ahrens' Marks.

22 178. Under no circumstances would Mr. Ahrens have licensed or otherwise granted any
23 permission for any of the Defendants to use in commerce any of Mr. Ahrens' Marks as
24 designations of origin of any services furnished by any of the Defendants.

25 179. Windermere willfully engaged in the unauthorized display, copying and distribution
26 of each of the Copyrighted Works and Mr. Ahrens' Commercial Properties.

27 180. Windermere willfully engaged in the use of Mr. Ahrens' Marks as designations of
28 origin of the online services furnished by Windermere.

1 181. Ms. Pecnick willfully engaged in the unauthorized display, copying and distribution
2 of each of the Copyrighted Works and Mr. Ahrens' Commercial Properties.

3 182. Ms. Pecnick willfully engaged in the use of Mr. Ahrens' Marks as designations of
4 origin of the online services furnished by Ms. Pecnick.

5 183. Mr. Shepelev willfully engaged in the unauthorized display, copying and distribution
6 of the subset of Copyrighted Works and of Mr. Ahrens' Commercial Properties that constitute
7 still photographs, including screen captures from audiovisual works.

8 184. Mr. Shepelev willfully engaged in the use of Mr. Ahrens' Marks as designations of
9 origin of the hosting services furnished by Mr. Shepelev.

10 185. KS willfully engaged in the unauthorized copying and distribution of the subset of
11 the Copyrighted Works and Mr. Ahrens' Commercial Properties that constitute audiovisual
12 works.

13 186. KS willfully engaged in the use of Mr. Ahrens' Marks as designations of origin of
14 the hosting services furnished by KS.

15 187. On or about March 18, 2015 Windermere responded to the Windermere Notice that
16 no action regarding the removal of any infringing content was being undertaken.

17 188. From March 14, 2015 through March 16, 2015 KS responded to the KS Notice on
18 multiple occasions stating KS was "unable to process" the KS Notice.

19 189. Windermere continues to display and distribute Mr. Ahrens' Copyrighted Works and
20 at least a subset of Mr. Ahrens' Commercial Properties on the Planetsuzy Website, as otherwise
21 identified herein.

22 190. Windermere continues to use Mr. Ahrens' Marks in commerce on the Planetsuzy
23 Website as indicators of origin of Windermere's online services.

24 191. Ms. Pecnick continues to display and distribute Mr. Ahrens' Copyrighted Works and
25 at least a subset of Mr. Ahrens' Commercial Properties on the Planetsuzy Website, as otherwise
26 identified herein.

27 192. Ms. Pecnick continues to use Mr. Ahrens' Marks in commerce on the Planetsuzy
28 Website as indicators of origin of Ms. Pecnick's online services.

1 193. KS continues to distribute at least a subset of Mr. Ahrens' Copyrighted Works and at
2 least a subset of Mr. Ahrens' Commercial Properties on the KS Website, as otherwise identified
3 herein.

4 194. KS continues to use Mr. Ahrens' Marks in commerce on the KS Website as
5 indicators of origin of KS's hosting services.

6 195. Mr. Shepelev continues to display and distribute at least a subset of Mr. Ahrens'
7 Copyrighted Works and at least a subset of Mr. Ahrens' Commercial Properties on the
8 Threepicture Website, as otherwise identified herein.

9 196. Mr. Shepelev continues to display and distribute at least a subset of Mr. Ahrens'
10 Copyrighted Works and at least a subset of Mr. Ahrens' Commercial Properties via embedding
11 on the Planetsuzy Website, as otherwise identified herein.

12 197. Mr. Shepelev continues to use Mr. Ahrens' Marks in commerce on the Threepicture
13 Website as indicators of origin of Mr. Shepelev's hosting services.

14 198. Mr. Shepelev continues to use Mr. Ahrens' Marks in commerce on the Planetsuzy
15 Website as indicators of origin of Mr. Shepelev's hosting services.

16 **FIRST CAUSE OF ACTION**

17 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

18 (against Ms. Pecnick)

19 199. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

20 200. Ms. Pecnick reproduced the Copyrighted Work No. 1 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

22 201. Ms. Pecnick distributed the Copyrighted Work No. 1 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

24 202. Ms. Pecnick displayed the Copyrighted Work No. 1 without authorization in
25 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

26 203. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
27 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).
28

1 204. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
2 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

3 205. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
4 Pecnick pursuant to 17 U.S.C. § 502(a).

5 206. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
6 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

7 **SECOND CAUSE OF ACTION**

8 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

9 (against Ms. Pecnick)

10 207. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

11 208. Ms. Pecnick reproduced the Copyrighted Work No. 2 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

13 209. Ms. Pecnick distributed the Copyrighted Work No. 2 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

15 210. Ms. Pecnick displayed the Copyrighted Work No. 2 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

17 211. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
18 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 212. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
20 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 213. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
22 Pecnick pursuant to 17 U.S.C. § 502(a).

23 214. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
24 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **THIRD CAUSE OF ACTION**

26 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

27 (against Ms. Pecnick)

28 215. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 216. Ms. Pecnick reproduced the Copyrighted Work No. 3 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

3 217. Ms. Pecnick distributed the Copyrighted Work No. 3 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

5 218. Ms. Pecnick displayed the Copyrighted Work No. 3 without authorization in
6 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

7 219. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
8 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

9 220. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
10 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

11 221. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
12 Pecnick pursuant to 17 U.S.C. § 502(a).

13 222. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
14 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

15 **FOURTH CAUSE OF ACTION**

16 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

17 (against Ms. Pecnick)

18 223. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

19 224. Ms. Pecnick reproduced the Copyrighted Work No. 4 without authorization in
20 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

21 225. Ms. Pecnick distributed the Copyrighted Work No. 4 without authorization in
22 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

23 226. Ms. Pecnick displayed the Copyrighted Work No. 4 without authorization in
24 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

25 227. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
26 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

27 228. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
28 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 229. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
2 Pecnick pursuant to 17 U.S.C. § 502(a).

3 230. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
4 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **FIFTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against Ms. Pecnick)

8 231. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 232. Ms. Pecnick reproduced the Copyrighted Work No. 5 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 233. Ms. Pecnick distributed the Copyrighted Work No. 5 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 234. Ms. Pecnick displayed the Copyrighted Work No. 5 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

15 235. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
16 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

17 236. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
18 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

19 237. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
20 Pecnick pursuant to 17 U.S.C. § 502(a).

21 238. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
22 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

23 **SIXTH CAUSE OF ACTION**

24 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

25 (against Ms. Pecnick)

26 239. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

27 240. Ms. Pecnick reproduced the Copyrighted Work No. 6 without authorization in
28 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1 241. Ms. Pecnick distributed the Copyrighted Work No. 6 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

3 242. Ms. Pecnick displayed the Copyrighted Work No. 6 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

5 243. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
6 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 244. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
8 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 245. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
10 Pecnick pursuant to 17 U.S.C. § 502(a).

11 246. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
12 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **SEVENTH CAUSE OF ACTION**

14 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

15 (against Ms. Pecnick)

16 247. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 248. Ms. Pecnick reproduced the Copyrighted Work No. 7 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

19 249. Ms. Pecnick distributed the Copyrighted Work No. 7 without authorization in
20 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

21 250. Ms. Pecnick displayed the Copyrighted Work No. 7 without authorization in
22 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

23 251. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
24 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

25 252. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
26 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

27 253. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
28 Pecnick pursuant to 17 U.S.C. § 502(a).

1 254. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
2 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

3 **EIGHTH CAUSE OF ACTION**

4 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

5 (against Ms. Pecnick)

6 255. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

7 256. Ms. Pecnick reproduced the Copyrighted Work No. 8 without authorization in
8 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

9 257. Ms. Pecnick distributed the Copyrighted Work No. 8 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

11 258. Ms. Pecnick displayed the Copyrighted Work No. 8 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

13 259. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
14 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 260. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
16 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 261. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
18 Pecnick pursuant to 17 U.S.C. § 502(a).

19 262. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
20 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **NINTH CAUSE OF ACTION**

22 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

23 (against Ms. Pecnick)

24 263. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 264. Ms. Pecnick reproduced the Copyrighted Work No. 9 without authorization in
26 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

27 265. Ms. Pecnick distributed the Copyrighted Work No. 9 without authorization in
28 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

ELEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

279. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

280. Ms. Pecnick reproduced the Copyrighted Work No. 11 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

281. Ms. Pecnick distributed the Copyrighted Work No. 11 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

282. Ms. Pecnick displayed the Copyrighted Work No. 11 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

283. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

284. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

285. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

286. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWELFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

287. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

288. Ms. Pecnick reproduced the Copyrighted Work No. 12 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

289. Ms. Pecnick distributed the Copyrighted Work No. 12 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

290. Ms. Pecnick displayed the Copyrighted Work No. 12 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 291. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 292. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 293. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 294. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **THIRTEENTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 295. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 296. Ms. Pecnick reproduced the Copyrighted Work No. 13 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 297. Ms. Pecnick distributed the Copyrighted Work No. 13 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 298. Ms. Pecnick displayed the Copyrighted Work No. 13 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 299. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 300. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 301. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 302. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FOURTEENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

303. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

304. Ms. Pecnick reproduced the Copyrighted Work No. 14 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

305. Ms. Pecnick distributed the Copyrighted Work No. 14 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

306. Ms. Pecnick displayed the Copyrighted Work No. 14 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

307. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

308. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

309. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

310. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FIFTEENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

311. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

312. Ms. Pecnick reproduced the Copyrighted Work No. 15 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

313. Ms. Pecnick distributed the Copyrighted Work No. 15 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

314. Ms. Pecnick displayed the Copyrighted Work No. 15 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 315. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 316. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 317. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 318. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **SIXTEENTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 319. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 320. Ms. Pecnick reproduced the Copyrighted Work No. 16 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 321. Ms. Pecnick distributed the Copyrighted Work No. 16 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 322. Ms. Pecnick displayed the Copyrighted Work No. 16 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 323. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 324. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 325. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 326. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SEVENTEENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

327. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

328. Ms. Pecnick reproduced the Copyrighted Work No. 17 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

329. Ms. Pecnick distributed the Copyrighted Work No. 17 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

330. Ms. Pecnick displayed the Copyrighted Work No. 17 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

331. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

332. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

333. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

334. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

EIGHTEENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

335. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

336. Ms. Pecnick reproduced the Copyrighted Work No. 18 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

337. Ms. Pecnick distributed the Copyrighted Work No. 18 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

338. Ms. Pecnick displayed the Copyrighted Work No. 18 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 339. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 340. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 341. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 342. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **NINETEENTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 343. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 344. Ms. Pecnick reproduced the Copyrighted Work No. 19 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 345. Ms. Pecnick distributed the Copyrighted Work No. 19 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 346. Ms. Pecnick displayed the Copyrighted Work No. 19 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 347. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 348. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 349. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 350. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWENTIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

351. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

352. Ms. Pecnick reproduced the Copyrighted Work No. 20 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

353. Ms. Pecnick distributed the Copyrighted Work No. 20 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

354. Ms. Pecnick displayed the Copyrighted Work No. 20 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

355. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

356. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

357. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

358. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWENTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

359. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

360. Ms. Pecnick reproduced the Copyrighted Work No. 21 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

361. Ms. Pecnick distributed the Copyrighted Work No. 21 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

362. Ms. Pecnick displayed the Copyrighted Work No. 21 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 363. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 364. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 365. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 366. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **TWENTY-SECOND CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 367. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 368. Ms. Pecnick reproduced the Copyrighted Work No. 22 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 369. Ms. Pecnick distributed the Copyrighted Work No. 22 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 370. Ms. Pecnick displayed the Copyrighted Work No. 22 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 371. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 372. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 373. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 374. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWENTY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

375. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

376. Ms. Pecnick reproduced the Copyrighted Work No. 23 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

377. Ms. Pecnick distributed the Copyrighted Work No. 23 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

378. Ms. Pecnick displayed the Copyrighted Work No. 23 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

379. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

380. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

381. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

382. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWENTY-FOURTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

383. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

384. Ms. Pecnick reproduced the Copyrighted Work No. 24 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

385. Ms. Pecnick distributed the Copyrighted Work No. 24 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

386. Ms. Pecnick displayed the Copyrighted Work No. 24 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 387. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 388. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 389. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 390. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **TWENTY-FIFTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 391. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 392. Ms. Pecnick reproduced the Copyrighted Work No. 25 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 393. Ms. Pecnick distributed the Copyrighted Work No. 25 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 394. Ms. Pecnick displayed the Copyrighted Work No. 25 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 395. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 396. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 397. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 398. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWENTY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

399. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

400. Ms. Pecnick reproduced the Copyrighted Work No. 26 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

401. Ms. Pecnick distributed the Copyrighted Work No. 26 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

402. Ms. Pecnick displayed the Copyrighted Work No. 26 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

403. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

404. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

405. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

406. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWENTY-SEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

407. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

408. Ms. Pecnick reproduced the Copyrighted Work No. 27 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

409. Ms. Pecnick distributed the Copyrighted Work No. 27 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

410. Ms. Pecnick displayed the Copyrighted Work No. 27 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 411. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 412. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 413. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 414. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **TWENTY-EIGHTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 415. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 416. Ms. Pecnick reproduced the Copyrighted Work No. 28 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 417. Ms. Pecnick distributed the Copyrighted Work No. 28 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 418. Ms. Pecnick displayed the Copyrighted Work No. 28 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 419. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 420. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 421. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 422. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWENTY-NINTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

423. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

424. Ms. Pecnick reproduced the Copyrighted Work No. 29 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

425. Ms. Pecnick distributed the Copyrighted Work No. 29 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

426. Ms. Pecnick displayed the Copyrighted Work No. 29 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

427. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

428. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

429. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

430. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

THIRTIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

431. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

432. Ms. Pecnick reproduced the Copyrighted Work No. 30 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

433. Ms. Pecnick distributed the Copyrighted Work No. 30 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

434. Ms. Pecnick displayed the Copyrighted Work No. 30 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 435. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 436. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 437. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 438. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **THIRTY-FIRST CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 439. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 440. Ms. Pecnick reproduced the Copyrighted Work No. 31 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 441. Ms. Pecnick distributed the Copyrighted Work No. 31 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 442. Ms. Pecnick displayed the Copyrighted Work No. 31 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 443. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 444. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 445. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 446. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

THIRTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

447. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

448. Ms. Pecnick reproduced the Copyrighted Work No. 32 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

449. Ms. Pecnick distributed the Copyrighted Work No. 32 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

450. Ms. Pecnick displayed the Copyrighted Work No. 32 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

451. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

452. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

453. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

454. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

THIRTY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

455. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

456. Ms. Pecnick reproduced the Copyrighted Work No. 33 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

457. Ms. Pecnick distributed the Copyrighted Work No. 33 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

458. Ms. Pecnick displayed the Copyrighted Work No. 33 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 459. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 460. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 461. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 462. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **THIRTY-FOURTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 463. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 464. Ms. Pecnick reproduced the Copyrighted Work No. 34 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 465. Ms. Pecnick distributed the Copyrighted Work No. 34 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 466. Ms. Pecnick displayed the Copyrighted Work No. 34 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 467. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 468. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 469. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 470. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

THIRTY-FIFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

471. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

472. Ms. Pecnick reproduced the Copyrighted Work No. 35 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

473. Ms. Pecnick distributed the Copyrighted Work No. 35 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

474. Ms. Pecnick displayed the Copyrighted Work No. 35 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

475. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

476. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

477. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

478. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

THIRTY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

479. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

480. Ms. Pecnick reproduced the Copyrighted Work No. 36 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

481. Ms. Pecnick distributed the Copyrighted Work No. 36 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

482. Ms. Pecnick displayed the Copyrighted Work No. 36 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 483. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 484. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 485. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 486. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **THIRTY-SEVENTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 487. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 488. Ms. Pecnick reproduced the Copyrighted Work No. 37 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 489. Ms. Pecnick distributed the Copyrighted Work No. 37 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 490. Ms. Pecnick displayed the Copyrighted Work No. 37 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 491. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 492. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 493. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 494. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

THIRTY-EIGHTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

495. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

496. Ms. Pecnick reproduced the Copyrighted Work No. 38 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

497. Ms. Pecnick distributed the Copyrighted Work No. 38 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

498. Ms. Pecnick displayed the Copyrighted Work No. 38 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

499. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

500. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

501. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

502. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

THIRTY-NINTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

503. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

504. Ms. Pecnick reproduced the Copyrighted Work No. 39 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

505. Ms. Pecnick distributed the Copyrighted Work No. 39 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

506. Ms. Pecnick displayed the Copyrighted Work No. 39 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 507. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 508. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 509. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 510. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **FORTIETH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 511. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 512. Ms. Pecnick reproduced the Copyrighted Work No. 40 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 513. Ms. Pecnick distributed the Copyrighted Work No. 40 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 514. Ms. Pecnick displayed the Copyrighted Work No. 40 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 515. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 516. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 517. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 518. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FORTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

519. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

520. Ms. Pecnick reproduced the Copyrighted Work No. 41 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

521. Ms. Pecnick distributed the Copyrighted Work No. 41 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

522. Ms. Pecnick displayed the Copyrighted Work No. 41 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

523. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

524. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

525. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

526. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FORTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

527. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

528. Ms. Pecnick reproduced the Copyrighted Work No. 42 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

529. Ms. Pecnick distributed the Copyrighted Work No. 42 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

530. Ms. Pecnick displayed the Copyrighted Work No. 42 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 531. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 532. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 533. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 534. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **FORTY-THIRD CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 535. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 536. Ms. Pecnick reproduced the Copyrighted Work No. 43 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 537. Ms. Pecnick distributed the Copyrighted Work No. 43 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 538. Ms. Pecnick displayed the Copyrighted Work No. 43 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 539. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 540. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 541. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 542. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FORTY-FOURTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

543. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

544. Ms. Pecnick reproduced the Copyrighted Work No. 44 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

545. Ms. Pecnick distributed the Copyrighted Work No. 44 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

546. Ms. Pecnick displayed the Copyrighted Work No. 44 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

547. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

548. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

549. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

550. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FORTY-FIFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

551. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

552. Ms. Pecnick reproduced the Copyrighted Work No. 45 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

553. Ms. Pecnick distributed the Copyrighted Work No. 45 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

554. Ms. Pecnick displayed the Copyrighted Work No. 45 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 555. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 556. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 557. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 558. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **FORTY-SIXTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 559. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 560. Ms. Pecnick reproduced the Copyrighted Work No. 46 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 561. Ms. Pecnick distributed the Copyrighted Work No. 46 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 562. Ms. Pecnick displayed the Copyrighted Work No. 46 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 563. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 564. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 565. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 566. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FORTY-SEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

567. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

568. Ms. Pecnick reproduced the Copyrighted Work No. 47 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

569. Ms. Pecnick distributed the Copyrighted Work No. 47 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

570. Ms. Pecnick displayed the Copyrighted Work No. 47 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

571. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

572. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

573. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

574. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FORTY-EIGHTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

575. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

576. Ms. Pecnick reproduced the Copyrighted Work No. 48 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

577. Ms. Pecnick distributed the Copyrighted Work No. 48 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

578. Ms. Pecnick displayed the Copyrighted Work No. 48 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 579. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 580. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 581. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 582. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **FORTY-NINTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 583. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 584. Ms. Pecnick reproduced the Copyrighted Work No. 49 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 585. Ms. Pecnick distributed the Copyrighted Work No. 49 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 586. Ms. Pecnick displayed the Copyrighted Work No. 49 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 587. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 588. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 589. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 590. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FIFTIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

591. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

592. Ms. Pecnick reproduced the Copyrighted Work No. 50 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

593. Ms. Pecnick distributed the Copyrighted Work No. 50 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

594. Ms. Pecnick displayed the Copyrighted Work No. 50 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

595. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

596. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

597. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

598. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FIFTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

599. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

600. Ms. Pecnick reproduced the Copyrighted Work No. 51 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

601. Ms. Pecnick distributed the Copyrighted Work No. 51 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

602. Ms. Pecnick displayed the Copyrighted Work No. 51 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 603. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 604. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 605. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 606. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **FIFTY-SECOND CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 607. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 608. Ms. Pecnick reproduced the Copyrighted Work No. 52 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 609. Ms. Pecnick distributed the Copyrighted Work No. 52 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 610. Ms. Pecnick displayed the Copyrighted Work No. 52 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 611. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 612. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 613. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 614. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FIFTY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

615. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

616. Ms. Pecnick reproduced the Copyrighted Work No. 53 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

617. Ms. Pecnick distributed the Copyrighted Work No. 53 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

618. Ms. Pecnick displayed the Copyrighted Work No. 53 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

619. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

620. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

621. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

622. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FIFTY-FOURTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

623. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

624. Ms. Pecnick reproduced the Copyrighted Work No. 54 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

625. Ms. Pecnick distributed the Copyrighted Work No. 54 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

626. Ms. Pecnick displayed the Copyrighted Work No. 54 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 627. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 628. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 629. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 630. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **FIFTY-FIFTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 631. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 632. Ms. Pecnick reproduced the Copyrighted Work No. 55 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 633. Ms. Pecnick distributed the Copyrighted Work No. 55 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 634. Ms. Pecnick displayed the Copyrighted Work No. 55 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 635. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 636. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 637. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 638. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FIFTY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

639. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

640. Ms. Pecnick reproduced the Copyrighted Work No. 56 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

641. Ms. Pecnick distributed the Copyrighted Work No. 56 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

642. Ms. Pecnick displayed the Copyrighted Work No. 56 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

643. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

644. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

645. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

646. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FIFTY-SEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

647. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

648. Ms. Pecnick reproduced the Copyrighted Work No. 57 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

649. Ms. Pecnick distributed the Copyrighted Work No. 57 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

650. Ms. Pecnick displayed the Copyrighted Work No. 57 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 651. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 652. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 653. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 654. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **FIFTY-EIGHTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 655. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 656. Ms. Pecnick reproduced the Copyrighted Work No. 58 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 657. Ms. Pecnick distributed the Copyrighted Work No. 58 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 658. Ms. Pecnick displayed the Copyrighted Work No. 58 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 659. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 660. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 661. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 662. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

FIFTY-NINTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

663. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

664. Ms. Pecnick reproduced the Copyrighted Work No. 59 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

665. Ms. Pecnick distributed the Copyrighted Work No. 59 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

666. Ms. Pecnick displayed the Copyrighted Work No. 59 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

667. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

668. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

669. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

670. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SIXTIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

671. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

672. Ms. Pecnick reproduced the Copyrighted Work No. 60 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

673. Ms. Pecnick distributed the Copyrighted Work No. 60 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

674. Ms. Pecnick displayed the Copyrighted Work No. 60 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

SIXTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

687. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

688. Ms. Pecnick reproduced the Copyrighted Work No. 62 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

689. Ms. Pecnick distributed the Copyrighted Work No. 62 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

690. Ms. Pecnick displayed the Copyrighted Work No. 62 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

691. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

692. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

693. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

694. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SIXTY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

695. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

696. Ms. Pecnick reproduced the Copyrighted Work No. 63 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

697. Ms. Pecnick distributed the Copyrighted Work No. 63 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

698. Ms. Pecnick displayed the Copyrighted Work No. 63 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 699. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 700. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 701. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 702. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **SIXTY-FOURTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 703. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 704. Ms. Pecnick reproduced the Copyrighted Work No. 64 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 705. Ms. Pecnick distributed the Copyrighted Work No. 64 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 706. Ms. Pecnick displayed the Copyrighted Work No. 64 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 707. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 708. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 709. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 710. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SIXTY-FIFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

711. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

712. Ms. Pecnick reproduced the Copyrighted Work No. 65 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

713. Ms. Pecnick distributed the Copyrighted Work No. 65 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

714. Ms. Pecnick displayed the Copyrighted Work No. 65 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

715. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

716. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

717. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

718. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SIXTY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

719. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

720. Ms. Pecnick reproduced the Copyrighted Work No. 66 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

721. Ms. Pecnick distributed the Copyrighted Work No. 66 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

722. Ms. Pecnick displayed the Copyrighted Work No. 66 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 723. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 724. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 725. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 726. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **SIXTY-SEVENTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 727. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 728. Ms. Pecnick reproduced the Copyrighted Work No. 67 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 729. Ms. Pecnick distributed the Copyrighted Work No. 67 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 730. Ms. Pecnick displayed the Copyrighted Work No. 67 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 731. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 732. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 733. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 734. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SIXTY-EIGHTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

735. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

736. Ms. Pecnick reproduced the Copyrighted Work No. 68 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

737. Ms. Pecnick distributed the Copyrighted Work No. 68 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

738. Ms. Pecnick displayed the Copyrighted Work No. 68 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

739. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

740. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

741. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

742. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SIXTY-NINTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

743. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

744. Ms. Pecnick reproduced the Copyrighted Work No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

745. Ms. Pecnick distributed the Copyrighted Work No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

746. Ms. Pecnick displayed the Copyrighted Work No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 747. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 748. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 749. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 750. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **SEVENTIETH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 751. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 752. Ms. Pecnick reproduced the Copyrighted Work No. 70 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 753. Ms. Pecnick distributed the Copyrighted Work No. 70 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 754. Ms. Pecnick displayed the Copyrighted Work No. 70 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 755. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 756. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 757. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 758. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SEVENTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

759. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

760. Ms. Pecnick reproduced the Copyrighted Work No. 71 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

761. Ms. Pecnick distributed the Copyrighted Work No. 71 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

762. Ms. Pecnick displayed the Copyrighted Work No. 71 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

763. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

764. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

765. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

766. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SEVENTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

767. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

768. Ms. Pecnick reproduced the Copyrighted Work No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

769. Ms. Pecnick distributed the Copyrighted Work No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

770. Ms. Pecnick displayed the Copyrighted Work No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 771. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 772. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 773. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 774. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **SEVENTY-THIRD CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 775. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 776. Ms. Pecnick reproduced the Copyrighted Work No. 73 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 777. Ms. Pecnick distributed the Copyrighted Work No. 73 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 778. Ms. Pecnick displayed the Copyrighted Work No. 73 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 779. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 780. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 781. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 782. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SEVENTY-FOURTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

783. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

784. Ms. Pecnick reproduced the Copyrighted Work No. 74 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

785. Ms. Pecnick distributed the Copyrighted Work No. 74 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

786. Ms. Pecnick displayed the Copyrighted Work No. 74 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

787. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

788. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

789. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

790. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SEVENTY-FIFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

791. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

792. Ms. Pecnick reproduced the Copyrighted Work No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

793. Ms. Pecnick distributed the Copyrighted Work No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

794. Ms. Pecnick displayed the Copyrighted Work No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 795. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 796. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
4 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 797. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
6 Pecnick pursuant to 17 U.S.C. § 502(a).

7 798. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **SEVENTY-SIXTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Ms. Pecnick)

12 799. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 800. Ms. Pecnick reproduced the Copyrighted Work No. 76 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 801. Ms. Pecnick distributed the Copyrighted Work No. 76 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 802. Ms. Pecnick displayed the Copyrighted Work No. 76 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 803. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
20 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 804. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms.
22 Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 805. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms.
24 Pecnick pursuant to 17 U.S.C. § 502(a).

25 806. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
26 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SEVENTY-SEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Ms. Pecnick)

807. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

808. Ms. Pecnick reproduced the Copyrighted Work No. 77 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

809. Ms. Pecnick distributed the Copyrighted Work No. 77 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

810. Ms. Pecnick displayed the Copyrighted Work No. 77 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

811. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

812. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

813. Plaintiff is entitled to a permanent injunction enjoining further infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

814. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

SEVENTY-EIGHTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

815. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

816. Windermere reproduced the Copyrighted Work No. 1 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

817. Windermere distributed the Copyrighted Work No. 1 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

818. Windermere displayed the Copyrighted Work No. 1 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 819. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 820. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 821. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 822. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **SEVENTY-NINTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 823. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 824. Windermere reproduced the Copyrighted Work No. 2 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 825. Windermere distributed the Copyrighted Work No. 2 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 826. Windermere displayed the Copyrighted Work No. 2 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 827. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 828. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 829. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 830. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

EIGHTIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

831. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

832. Windermere reproduced the Copyrighted Work No. 3 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

833. Windermere distributed the Copyrighted Work No. 3 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

834. Windermere displayed the Copyrighted Work No. 3 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

835. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

836. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

837. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

838. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

EIGHTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

839. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

840. Windermere reproduced the Copyrighted Work No. 4 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

841. Windermere distributed the Copyrighted Work No. 4 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

842. Windermere displayed the Copyrighted Work No. 4 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 843. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 844. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 845. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 846. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **EIGHTY-SECOND CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 847. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 848. Windermere reproduced the Copyrighted Work No. 5 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 849. Windermere distributed the Copyrighted Work No. 5 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 850. Windermere displayed the Copyrighted Work No. 5 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 851. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 852. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 853. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 854. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

EIGHTY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

855. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

856. Windermere reproduced the Copyrighted Work No. 6 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

857. Windermere distributed the Copyrighted Work No. 6 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

858. Windermere displayed the Copyrighted Work No. 6 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

859. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

860. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

861. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

862. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

EIGHTY-FOURTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

863. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

864. Windermere reproduced the Copyrighted Work No. 7 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

865. Windermere distributed the Copyrighted Work No. 7 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

866. Windermere displayed the Copyrighted Work No. 7 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 867. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 868. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 869. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 870. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **EIGHTY-FIFTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 871. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 872. Windermere reproduced the Copyrighted Work No. 8 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 873. Windermere distributed the Copyrighted Work No. 8 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 874. Windermere displayed the Copyrighted Work No. 8 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 875. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 876. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 877. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 878. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

EIGHTY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

879. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

880. Windermere reproduced the Copyrighted Work No. 9 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

881. Windermere distributed the Copyrighted Work No. 9 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

882. Windermere displayed the Copyrighted Work No. 9 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

883. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

884. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

885. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

886. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

EIGHT-SEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

887. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

888. Windermere reproduced the Copyrighted Work No. 10 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

889. Windermere distributed the Copyrighted Work No. 10 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

890. Windermere displayed the Copyrighted Work No. 10 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 891. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 892. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 893. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 894. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **EIGHTY-EIGHTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 895. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 896. Windermere reproduced the Copyrighted Work No. 11 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 897. Windermere distributed the Copyrighted Work No. 11 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 898. Windermere displayed the Copyrighted Work No. 11 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 899. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 900. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 901. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 902. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

EIGHTY-NINTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

903. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

904. Windermere reproduced the Copyrighted Work No. 12 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

905. Windermere distributed the Copyrighted Work No. 12 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

906. Windermere displayed the Copyrighted Work No. 12 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

907. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

908. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

909. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

910. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

NINETIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

911. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

912. Windermere reproduced the Copyrighted Work No. 13 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

913. Windermere distributed the Copyrighted Work No. 13 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

914. Windermere displayed the Copyrighted Work No. 13 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 915. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 916. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 917. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 918. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **NINETY-FIRST CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 919. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 920. Windermere reproduced the Copyrighted Work No. 14 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 921. Windermere distributed the Copyrighted Work No. 14 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 922. Windermere displayed the Copyrighted Work No. 14 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 923. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 924. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 925. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 926. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

NINETY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

927. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

928. Windermere reproduced the Copyrighted Work No. 15 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

929. Windermere distributed the Copyrighted Work No. 15 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

930. Windermere displayed the Copyrighted Work No. 15 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

931. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

932. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

933. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

934. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

NINETY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

935. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

936. Windermere reproduced the Copyrighted Work No. 16 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

937. Windermere distributed the Copyrighted Work No. 16 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

938. Windermere displayed the Copyrighted Work No. 16 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 939. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 940. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 941. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 942. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **NINETY-FOURTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 943. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 944. Windermere reproduced the Copyrighted Work No. 17 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 945. Windermere distributed the Copyrighted Work No. 17 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 946. Windermere displayed the Copyrighted Work No. 17 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 947. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 948. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 949. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 950. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

NINETY-FIFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

951. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

952. Windermere reproduced the Copyrighted Work No. 18 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

953. Windermere distributed the Copyrighted Work No. 18 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

954. Windermere displayed the Copyrighted Work No. 18 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

955. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

956. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

957. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

958. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

NINETY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

959. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

960. Windermere reproduced the Copyrighted Work No. 19 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

961. Windermere distributed the Copyrighted Work No. 19 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

962. Windermere displayed the Copyrighted Work No. 19 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 963. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 964. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 965. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 966. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **NINETY-SEVENTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 967. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 968. Windermere reproduced the Copyrighted Work No. 20 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 969. Windermere distributed the Copyrighted Work No. 20 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 970. Windermere displayed the Copyrighted Work No. 20 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 971. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 972. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 973. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 974. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

NINETY-EIGHTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

975. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

976. Windermere reproduced the Copyrighted Work No. 21 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

977. Windermere distributed the Copyrighted Work No. 21 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

978. Windermere displayed the Copyrighted Work No. 21 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

979. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

980. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

981. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

982. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

NINETY-NINTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

983. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

984. Windermere reproduced the Copyrighted Work No. 22 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

985. Windermere distributed the Copyrighted Work No. 22 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

986. Windermere displayed the Copyrighted Work No. 22 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 987. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 988. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 989. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 990. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDREDTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 991. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 992. Windermere reproduced the Copyrighted Work No. 23 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 993. Windermere distributed the Copyrighted Work No. 23 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 994. Windermere displayed the Copyrighted Work No. 23 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 995. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 996. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 997. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 998. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

999. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1000. Windermere reproduced the Copyrighted Work No. 24 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1001. Windermere distributed the Copyrighted Work No. 24 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1002. Windermere displayed the Copyrighted Work No. 24 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1003. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1004. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1005. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1006. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1007. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1008. Windermere reproduced the Copyrighted Work No. 25 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1009. Windermere distributed the Copyrighted Work No. 25 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1010. Windermere displayed the Copyrighted Work No. 25 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1011. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1012. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1013. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1014. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED THIRD CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1015. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1016. Windermere reproduced the Copyrighted Work No. 26 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1017. Windermere distributed the Copyrighted Work No. 26 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1018. Windermere displayed the Copyrighted Work No. 26 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1019. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1020. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1021. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1022. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FOURTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1023. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1024. Windermere reproduced the Copyrighted Work No. 27 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1025. Windermere distributed the Copyrighted Work No. 27 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1026. Windermere displayed the Copyrighted Work No. 27 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1027. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1028. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1029. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1030. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FIFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1031. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1032. Windermere reproduced the Copyrighted Work No. 28 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1033. Windermere distributed the Copyrighted Work No. 28 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1034. Windermere displayed the Copyrighted Work No. 28 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1035. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1036. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1037. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1038. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED SIXTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1039. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1040. Windermere reproduced the Copyrighted Work No. 29 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1041. Windermere distributed the Copyrighted Work No. 29 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1042. Windermere displayed the Copyrighted Work No. 29 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1043. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1044. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1045. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1046. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1047. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1048. Windermere reproduced the Copyrighted Work No. 30 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1049. Windermere distributed the Copyrighted Work No. 30 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1050. Windermere displayed the Copyrighted Work No. 30 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1051. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1052. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1053. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1054. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED EIGHTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1055. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1056. Windermere reproduced the Copyrighted Work No. 31 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1057. Windermere distributed the Copyrighted Work No. 31 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1058. Windermere displayed the Copyrighted Work No. 31 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1059. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1060. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1061. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1062. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED NINTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1063. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1064. Windermere reproduced the Copyrighted Work No. 32 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1065. Windermere distributed the Copyrighted Work No. 32 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1066. Windermere displayed the Copyrighted Work No. 32 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1067. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1068. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1069. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1070. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED TENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1071. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1072. Windermere reproduced the Copyrighted Work No. 33 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1073. Windermere distributed the Copyrighted Work No. 33 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1074. Windermere displayed the Copyrighted Work No. 33 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1075. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1076. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1077. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1078. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED ELEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1079. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1080. Windermere reproduced the Copyrighted Work No. 34 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1081. Windermere distributed the Copyrighted Work No. 34 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1082. Windermere displayed the Copyrighted Work No. 34 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1083. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1084. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1085. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1086. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED TWELFTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1087. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1088. Windermere reproduced the Copyrighted Work No. 35 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1089. Windermere distributed the Copyrighted Work No. 35 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1090. Windermere displayed the Copyrighted Work No. 35 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1091. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1092. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1093. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1094. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED THIRTEENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1095. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1096. Windermere reproduced the Copyrighted Work No. 36 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1097. Windermere distributed the Copyrighted Work No. 36 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1098. Windermere displayed the Copyrighted Work No. 36 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1099. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1100. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1101. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1102. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FOURTEENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1103. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1104. Windermere reproduced the Copyrighted Work No. 37 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1105. Windermere distributed the Copyrighted Work No. 37 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1106. Windermere displayed the Copyrighted Work No. 37 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1107. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1108. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1109. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1110. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED FIFTEENTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1111. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1112. Windermere reproduced the Copyrighted Work No. 38 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1113. Windermere distributed the Copyrighted Work No. 38 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1114. Windermere displayed the Copyrighted Work No. 38 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1115. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1116. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1117. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1118. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SIXTEENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1119. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1120. Windermere reproduced the Copyrighted Work No. 39 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1121. Windermere distributed the Copyrighted Work No. 39 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1122. Windermere displayed the Copyrighted Work No. 39 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1123. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1124. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1125. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1126. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SEVENTEENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1127. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1128. Windermere reproduced the Copyrighted Work No. 40 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1129. Windermere distributed the Copyrighted Work No. 40 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1130. Windermere displayed the Copyrighted Work No. 40 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1131. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1132. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1133. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1134. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED EIGHTEENTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1135. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1136. Windermere reproduced the Copyrighted Work No. 41 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1137. Windermere distributed the Copyrighted Work No. 41 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1138. Windermere displayed the Copyrighted Work No. 41 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1139. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1140. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1141. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1142. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED NINETEENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1143. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1144. Windermere reproduced the Copyrighted Work No. 42 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1145. Windermere distributed the Copyrighted Work No. 42 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1146. Windermere displayed the Copyrighted Work No. 42 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1147. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1148. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1149. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1150. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED TWENTIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1151. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1152. Windermere reproduced the Copyrighted Work No. 43 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1153. Windermere distributed the Copyrighted Work No. 43 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1154. Windermere displayed the Copyrighted Work No. 43 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1155. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1156. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1157. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1158. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED TWENTY-FIRST CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1159. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1160. Windermere reproduced the Copyrighted Work No. 44 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1161. Windermere distributed the Copyrighted Work No. 44 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1162. Windermere displayed the Copyrighted Work No. 44 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1163. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1164. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1165. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1166. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED TWENTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1167. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1168. Windermere reproduced the Copyrighted Work No. 45 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1169. Windermere distributed the Copyrighted Work No. 45 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1170. Windermere displayed the Copyrighted Work No. 45 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1171. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1172. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1173. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1174. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED TWENTY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1175. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1176. Windermere reproduced the Copyrighted Work No. 46 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1177. Windermere distributed the Copyrighted Work No. 46 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1178. Windermere displayed the Copyrighted Work No. 46 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1179. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1180. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1181. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1182. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED TWENTY-FOURTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1183. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1184. Windermere reproduced the Copyrighted Work No. 47 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1185. Windermere distributed the Copyrighted Work No. 47 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1186. Windermere displayed the Copyrighted Work No. 47 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1187. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1188. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1189. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1190. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED TWENTY-FIFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1191. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1192. Windermere reproduced the Copyrighted Work No. 48 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1193. Windermere distributed the Copyrighted Work No. 48 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1194. Windermere displayed the Copyrighted Work No. 48 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1195. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1196. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1197. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1198. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED TWENTY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1199. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1200. Windermere reproduced the Copyrighted Work No. 49 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1201. Windermere distributed the Copyrighted Work No. 49 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1202. Windermere displayed the Copyrighted Work No. 49 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

ONE HUNDRED TWENTY-EIGHTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1215. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1216. Windermere reproduced the Copyrighted Work No. 51 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1217. Windermere distributed the Copyrighted Work No. 51 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1218. Windermere displayed the Copyrighted Work No. 51 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1219. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1220. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1221. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1222. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED TWENTY-NINTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1223. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1224. Windermere reproduced the Copyrighted Work No. 52 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1225. Windermere distributed the Copyrighted Work No. 52 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1226. Windermere displayed the Copyrighted Work No. 52 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1227. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1228. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1229. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1230. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED THIRTIETH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1231. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1232. Windermere reproduced the Copyrighted Work No. 53 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1233. Windermere distributed the Copyrighted Work No. 53 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1234. Windermere displayed the Copyrighted Work No. 53 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1235. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1236. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1237. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1238. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED THIRTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1239. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1240. Windermere reproduced the Copyrighted Work No. 54 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1241. Windermere distributed the Copyrighted Work No. 54 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1242. Windermere displayed the Copyrighted Work No. 54 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1243. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1244. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1245. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1246. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED THIRTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1247. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1248. Windermere reproduced the Copyrighted Work No. 55 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1249. Windermere distributed the Copyrighted Work No. 55 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1250. Windermere displayed the Copyrighted Work No. 55 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1251. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1252. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1253. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1254. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED THIRTY-THIRD CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1255. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1256. Windermere reproduced the Copyrighted Work No. 56 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1257. Windermere distributed the Copyrighted Work No. 56 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1258. Windermere displayed the Copyrighted Work No. 56 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1259. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1260. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1261. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1262. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED THIRTY-FOURTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1263. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1264. Windermere reproduced the Copyrighted Work No. 57 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1265. Windermere distributed the Copyrighted Work No. 57 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1266. Windermere displayed the Copyrighted Work No. 57 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1267. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1268. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1269. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1270. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED THIRTY-FIFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1271. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1272. Windermere reproduced the Copyrighted Work No. 58 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1273. Windermere distributed the Copyrighted Work No. 58 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1274. Windermere displayed the Copyrighted Work No. 58 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1275. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1276. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1277. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1278. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED THIRTY-SIXTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1279. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1280. Windermere reproduced the Copyrighted Work No. 59 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1281. Windermere distributed the Copyrighted Work No. 59 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1282. Windermere displayed the Copyrighted Work No. 59 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1283. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1284. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1285. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1286. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED THIRTY-SEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1287. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1288. Windermere reproduced the Copyrighted Work No. 60 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1289. Windermere distributed the Copyrighted Work No. 60 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1290. Windermere displayed the Copyrighted Work No. 60 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1291. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1292. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1293. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1294. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED THIRTY-EIGHTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1295. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1296. Windermere reproduced the Copyrighted Work No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1297. Windermere distributed the Copyrighted Work No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1298. Windermere displayed the Copyrighted Work No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

ONE HUNDRED FORTIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1311. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1312. Windermere reproduced the Copyrighted Work No. 63 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1313. Windermere distributed the Copyrighted Work No. 63 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1314. Windermere displayed the Copyrighted Work No. 63 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1315. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1316. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1317. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1318. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FORTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1319. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1320. Windermere reproduced the Copyrighted Work No. 64 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1321. Windermere distributed the Copyrighted Work No. 64 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1322. Windermere displayed the Copyrighted Work No. 64 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

ONE HUNDRED FORTY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1335. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1336. Windermere reproduced the Copyrighted Work No. 66 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1337. Windermere distributed the Copyrighted Work No. 66 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1338. Windermere displayed the Copyrighted Work No. 66 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1339. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1340. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1341. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1342. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FORTY-FOURTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1343. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1344. Windermere reproduced the Copyrighted Work No. 67 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1345. Windermere distributed the Copyrighted Work No. 67 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1346. Windermere displayed the Copyrighted Work No. 67 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1347. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1348. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1349. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1350. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED FORTY-FIFTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1351. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1352. Windermere reproduced the Copyrighted Work No. 68 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1353. Windermere distributed the Copyrighted Work No. 68 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1354. Windermere displayed the Copyrighted Work No. 68 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1355. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1356. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1357. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1358. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FORTY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1359. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1360. Windermere reproduced the Copyrighted Work No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1361. Windermere distributed the Copyrighted Work No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1362. Windermere displayed the Copyrighted Work No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1363. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1364. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1365. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1366. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FORTY-SEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1367. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1368. Windermere reproduced the Copyrighted Work No. 70 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1369. Windermere distributed the Copyrighted Work No. 70 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1370. Windermere displayed the Copyrighted Work No. 70 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1371. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1372. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1373. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1374. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED FORTY-EIGHTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1375. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1376. Windermere reproduced the Copyrighted Work No. 71 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1377. Windermere distributed the Copyrighted Work No. 71 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1378. Windermere displayed the Copyrighted Work No. 71 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1379. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1380. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1381. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1382. Plaintiff has incurred costs of suit in connection with bringing this action, and
26 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FORTY-NINTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1383. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1384. Windermere reproduced the Copyrighted Work No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1385. Windermere distributed the Copyrighted Work No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1386. Windermere displayed the Copyrighted Work No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1387. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1388. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1389. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1390. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FIFTIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1391. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1392. Windermere reproduced the Copyrighted Work No. 73 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1393. Windermere distributed the Copyrighted Work No. 73 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1394. Windermere displayed the Copyrighted Work No. 73 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

ONE HUNDRED FIFTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1407. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1408. Windermere reproduced the Copyrighted Work No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1409. Windermere distributed the Copyrighted Work No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1410. Windermere displayed the Copyrighted Work No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1411. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1412. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1413. Plaintiff is entitled to a permanent injunction enjoining further infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1414. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FIFTY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Windermere)

1415. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1416. Windermere reproduced the Copyrighted Work No. 76 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1417. Windermere distributed the Copyrighted Work No. 76 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1418. Windermere displayed the Copyrighted Work No. 76 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1419. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1420. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1421. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 Windermere pursuant to 17 U.S.C. § 502(a).

7 1422. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED FIFTY-FOURTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against Windermere)

12 1423. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1424. Windermere reproduced the Copyrighted Work No. 77 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1425. Windermere distributed the Copyrighted Work No. 77 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1426. Windermere displayed the Copyrighted Work No. 77 without authorization in
18 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

19 1427. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
20 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

21 1428. Windermere has profited as a result of Windermere's acts as alleged herein, and
22 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

23 1429. Plaintiff is entitled to a permanent injunction enjoining further infringement by
24 Windermere pursuant to 17 U.S.C. § 502(a).

25 1430. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
26 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FIFTY-FIFTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against KS)

1431. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1432. KS reproduced the Copyrighted Work No. 28 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1433. KS distributed the Copyrighted Work No. 28 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1434. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1435. KS has profited as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1436. Plaintiff is entitled to a permanent injunction enjoining further infringement by KS pursuant to 17 U.S.C. § 502(a).

1437. Plaintiff has incurred costs of suit in connection with bringing this action, and KS is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED FIFTY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against KS)

1438. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1439. KS reproduced the Copyrighted Work No. 29 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1440. KS distributed the Copyrighted Work No. 29 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1441. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1442. KS has profited as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1443. Plaintiff is entitled to a permanent injunction enjoining further infringement by
2 KS pursuant to 17 U.S.C. § 502(a).

3 1444. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
4 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **ONE HUNDRED FIFTY-SEVENTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against KS)

8 1445. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1446. KS reproduced the Copyrighted Work No. 30 without authorization in derogation
10 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 1447. KS distributed the Copyrighted Work No. 30 without authorization in derogation
12 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 1448. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
14 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1449. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
16 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1450. Plaintiff is entitled to a permanent injunction enjoining further infringement by
18 KS pursuant to 17 U.S.C. § 502(a).

19 1451. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
20 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **ONE HUNDRED FIFTY-EIGHTH CAUSE OF ACTION**

22 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

23 (against KS)

24 1452. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1453. KS reproduced the Copyrighted Work No. 32 without authorization in derogation
26 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

27 1454. KS distributed the Copyrighted Work No. 32 without authorization in derogation
28 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1 1455. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
2 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1456. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
4 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1457. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 KS pursuant to 17 U.S.C. § 502(a).

7 1458. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
8 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED FIFTY-NINTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against KS)

12 1459. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1460. KS reproduced the Copyrighted Work No. 57 without authorization in derogation
14 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1461. KS distributed the Copyrighted Work No. 57 without authorization in derogation
16 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1462. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
18 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 1463. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
20 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 1464. Plaintiff is entitled to a permanent injunction enjoining further infringement by
22 KS pursuant to 17 U.S.C. § 502(a).

23 1465. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
24 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **ONE HUNDRED SIXTIETH CAUSE OF ACTION**

26 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

27 (against KS)

28 1466. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 1467. KS reproduced the Copyrighted Work No. 58 without authorization in derogation
2 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

3 1468. KS distributed the Copyrighted Work No. 58 without authorization in derogation
4 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

5 1469. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
6 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1470. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
8 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1471. Plaintiff is entitled to a permanent injunction enjoining further infringement by
10 KS pursuant to 17 U.S.C. § 502(a).

11 1472. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
12 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **ONE HUNDRED SIXTY-FIRST CAUSE OF ACTION**

14 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

15 (against KS)

16 1473. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1474. KS reproduced the Copyrighted Work No. 60 without authorization in derogation
18 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

19 1475. KS distributed the Copyrighted Work No. 60 without authorization in derogation
20 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

21 1476. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
22 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1477. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
24 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1478. Plaintiff is entitled to a permanent injunction enjoining further infringement by
26 KS pursuant to 17 U.S.C. § 502(a).

27 1479. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
28 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SIXTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against KS)

1480. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1481. KS reproduced the Copyrighted Work No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1482. KS distributed the Copyrighted Work No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1483. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1484. KS has profited as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1485. Plaintiff is entitled to a permanent injunction enjoining further infringement by KS pursuant to 17 U.S.C. § 502(a).

1486. Plaintiff has incurred costs of suit in connection with bringing this action, and KS is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SIXTY-THIRD CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against KS)

1487. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1488. KS reproduced the Copyrighted Work No. 62 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1489. KS distributed the Copyrighted Work No. 62 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1490. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1491. KS has profited as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1492. Plaintiff is entitled to a permanent injunction enjoining further infringement by
2 KS pursuant to 17 U.S.C. § 502(a).

3 1493. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
4 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **ONE HUNDRED SIXTY-FOURTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against KS)

8 1494. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1495. KS reproduced the Copyrighted Work No. 63 without authorization in derogation
10 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 1496. KS distributed the Copyrighted Work No. 63 without authorization in derogation
12 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 1497. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
14 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1498. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
16 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1499. Plaintiff is entitled to a permanent injunction enjoining further infringement by
18 KS pursuant to 17 U.S.C. § 502(a).

19 1500. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
20 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **ONE HUNDRED SIXTY-FIFTH OF ACTION**

22 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

23 (against KS)

24 1501. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1502. KS reproduced the Copyrighted Work No. 64 without authorization in derogation
26 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

27 1503. KS distributed the Copyrighted Work No. 64 without authorization in derogation
28 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1 1504. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
2 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1505. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
4 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1506. Plaintiff is entitled to a permanent injunction enjoining further infringement by
6 KS pursuant to 17 U.S.C. § 502(a).

7 1507. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
8 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED SIXTY-SIXTH CAUSE OF ACTION**

10 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

11 (against KS)

12 1508. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1509. KS reproduced the Copyrighted Work No. 65 without authorization in derogation
14 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

15 1510. KS distributed the Copyrighted Work No. 65 without authorization in derogation
16 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

17 1511. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
18 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 1512. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
20 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 1513. Plaintiff is entitled to a permanent injunction enjoining further infringement by
22 KS pursuant to 17 U.S.C. § 502(a).

23 1514. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
24 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **ONE HUNDRED SIXTY-SEVENTH CAUSE OF ACTION**

26 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

27 (against KS)

28 1515. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 1516. KS reproduced the Copyrighted Work No. 66 without authorization in derogation
2 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

3 1517. KS distributed the Copyrighted Work No. 66 without authorization in derogation
4 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

5 1518. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
6 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1519. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
8 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1520. Plaintiff is entitled to a permanent injunction enjoining further infringement by
10 KS pursuant to 17 U.S.C. § 502(a).

11 1521. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
12 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **ONE HUNDRED SIXTY-EIGHTH CAUSE OF ACTION**

14 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

15 (against KS)

16 1522. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1523. KS reproduced the Copyrighted Work No. 67 without authorization in derogation
18 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

19 1524. KS distributed the Copyrighted Work No. 67 without authorization in derogation
20 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

21 1525. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
22 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1526. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
24 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1527. Plaintiff is entitled to a permanent injunction enjoining further infringement by
26 KS pursuant to 17 U.S.C. § 502(a).

27 1528. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
28 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SIXTY-NINTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against KS)

1529. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1530. KS reproduced the Copyrighted Work No. 68 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1531. KS distributed the Copyrighted Work No. 68 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1532. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1533. KS has profited as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1534. Plaintiff is entitled to a permanent injunction enjoining further infringement by KS pursuant to 17 U.S.C. § 502(a).

1535. Plaintiff has incurred costs of suit in connection with bringing this action, and KS is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SEVENTIETH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against KS)

1536. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1537. KS reproduced the Copyrighted Work No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1538. KS distributed the Copyrighted Work No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1539. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1540. KS has profited as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1541. Plaintiff is entitled to a permanent injunction enjoining further infringement by
2 KS pursuant to 17 U.S.C. § 502(a).

3 1542. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
4 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **ONE HUNDRED SEVENTY-FIRST CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against KS)

8 1543. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1544. KS reproduced the Copyrighted Work No. 70 without authorization in derogation
10 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 1545. KS distributed the Copyrighted Work No. 70 without authorization in derogation
12 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 1546. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
14 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1547. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
16 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1548. Plaintiff is entitled to a permanent injunction enjoining further infringement by
18 KS pursuant to 17 U.S.C. § 502(a).

19 1549. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
20 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **ONE HUNDRED SEVENTY-SECOND CAUSE OF ACTION**

22 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

23 (against KS)

24 1550. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1551. KS reproduced the Copyrighted Work No. 71 without authorization in derogation
26 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

27 1552. KS distributed the Copyrighted Work No. 71 without authorization in derogation
28 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1 1565. KS reproduced the Copyrighted Work No. 73 without authorization in derogation
2 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

3 1566. KS distributed the Copyrighted Work No. 73 without authorization in derogation
4 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

5 1567. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
6 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1568. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
8 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1569. Plaintiff is entitled to a permanent injunction enjoining further infringement by
10 KS pursuant to 17 U.S.C. § 502(a).

11 1570. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
12 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **ONE HUNDRED SEVENTY-FIFTH CAUSE OF ACTION**

14 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

15 (against KS)

16 1571. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1572. KS reproduced the Copyrighted Work No. 74 without authorization in derogation
18 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

19 1573. KS distributed the Copyrighted Work No. 74 without authorization in derogation
20 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

21 1574. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
22 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1575. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
24 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1576. Plaintiff is entitled to a permanent injunction enjoining further infringement by
26 KS pursuant to 17 U.S.C. § 502(a).

27 1577. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
28 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SEVENTY-SIXTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against KS)

1578. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1579. KS reproduced the Copyrighted Work No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1580. KS distributed the Copyrighted Work No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1581. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1582. KS has profited as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1583. Plaintiff is entitled to a permanent injunction enjoining further infringement by KS pursuant to 17 U.S.C. § 502(a).

1584. Plaintiff has incurred costs of suit in connection with bringing this action, and KS is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED SEVENTY-SEVENTH CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against KS)

1585. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1586. KS reproduced the Copyrighted Work No. 76 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1587. KS distributed the Copyrighted Work No. 76 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1588. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1589. KS has profited as a result of KS's acts as alleged herein, and KS is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1590. Plaintiff is entitled to a permanent injunction enjoining further infringement by
2 KS pursuant to 17 U.S.C. § 502(a).

3 1591. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
4 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **ONE HUNDRED SEVENTY-EIGHTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against KS)

8 1592. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1593. KS reproduced the Copyrighted Work No. 77 without authorization in derogation
10 of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 1594. KS distributed the Copyrighted Work No. 77 without authorization in derogation
12 of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 1595. Plaintiff has sustained actual damages as a result of KS's acts as alleged herein,
14 and KS is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1596. KS has profited as a result of KS's acts as alleged herein, and KS is liable to
16 Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1597. Plaintiff is entitled to a permanent injunction enjoining further infringement by
18 KS pursuant to 17 U.S.C. § 502(a).

19 1598. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
20 is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **ONE HUNDRED SEVENTY-NINTH CAUSE OF ACTION**

22 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

23 (against Windermere with respect to KS's infringement)

24 1599. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1600. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
26 No. 28 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

27 1601. Windermere induced, caused (by way of promotion) and materially contributed to
28 such infringing conduct by KS of the Copyrighted Work No. 28.

1 1602. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1603. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1604. Plaintiff is entitled to a permanent injunction enjoining further contributory
6 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

7 1605. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED EIGHTIETH CAUSE OF ACTION**

10 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

11 (against Windermere with respect to KS's infringement)

12 1606. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1607. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
14 No. 29 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

15 1608. Windermere induced, caused (by way of promotion) and materially contributed to
16 such infringing conduct by KS of the Copyrighted Work No. 29.

17 1609. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
18 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 1610. Windermere has profited as a result of Windermere's acts as alleged herein, and
20 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 1611. Plaintiff is entitled to a permanent injunction enjoining further contributory
22 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

23 1612. Plaintiff has incurred costs of suit in connection with bringing this action, and
24 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **ONE HUNDRED EIGHTY-FIRST CAUSE OF ACTION**

26 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

27 (against Windermere with respect to KS's infringement)

28 1613. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 1614. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
2 No. 30 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

3 1615. Windermere induced, caused (by way of promotion) and materially contributed to
4 such infringing conduct by KS of the Copyrighted Work No. 30.

5 1616. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
6 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1617. Windermere has profited as a result of Windermere's acts as alleged herein, and
8 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1618. Plaintiff is entitled to a permanent injunction enjoining further contributory
10 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

11 1619. Plaintiff has incurred costs of suit in connection with bringing this action, and
12 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **ONE HUNDRED EIGHTY-SECOND CAUSE OF ACTION**

14 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

15 (against Windermere with respect to KS's infringement)

16 1620. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1621. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
18 No. 32 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

19 1622. Windermere induced, caused (by way of promotion) and materially contributed to
20 such infringing conduct by KS of the Copyrighted Work No. 32.

21 1623. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
22 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1624. Windermere has profited as a result of Windermere's acts as alleged herein, and
24 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1625. Plaintiff is entitled to a permanent injunction enjoining further contributory
26 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

27 1626. Plaintiff has incurred costs of suit in connection with bringing this action, and
28 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED EIGHTY-THIRD CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Windermere with respect to KS's infringement)

1627. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1628. Windermere knew of KS's reproduction and distribution of the Copyrighted Work No. 57 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1629. Windermere induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 57.

1630. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1631. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1632. Plaintiff is entitled to a permanent injunction enjoining further contributory infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1633. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED EIGHTY-FORTH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Windermere with respect to KS's infringement)

1634. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1635. Windermere knew of KS's reproduction and distribution of the Copyrighted Work No. 58 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1636. Windermere induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 58.

1637. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1638. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1639. Plaintiff is entitled to a permanent injunction enjoining further contributory
2 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

3 1640. Plaintiff has incurred costs of suit in connection with bringing this action, and
4 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **ONE HUNDRED EIGHTY-FIFTH CAUSE OF ACTION**

6 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

7 (against Windermere with respect to KS's infringement)

8 1641. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1642. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
10 No. 60 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

11 1643. Windermere induced, caused (by way of promotion) and materially contributed to
12 such infringing conduct by KS of the Copyrighted Work No. 60.

13 1644. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
14 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1645. Windermere has profited as a result of Windermere's acts as alleged herein, and
16 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1646. Plaintiff is entitled to a permanent injunction enjoining further contributory
18 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

19 1647. Plaintiff has incurred costs of suit in connection with bringing this action, and
20 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **ONE HUNDRED EIGHTY-SIXTH CAUSE OF ACTION**

22 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

23 (against Windermere with respect to KS's infringement)

24 1648. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1649. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
26 No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

27 1650. Windermere induced, caused (by way of promotion) and materially contributed to
28 such infringing conduct by KS of the Copyrighted Work No. 61.

1 1651. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1652. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1653. Plaintiff is entitled to a permanent injunction enjoining further contributory
6 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

7 1654. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED EIGHTY-SEVENTH CAUSE OF ACTION**

10 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

11 (against Windermere with respect to KS's infringement)

12 1655. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1656. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
14 No. 62 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

15 1657. Windermere induced, caused (by way of promotion) and materially contributed to
16 such infringing conduct by KS of the Copyrighted Work No. 62.

17 1658. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
18 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 1659. Windermere has profited as a result of Windermere's acts as alleged herein, and
20 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 1660. Plaintiff is entitled to a permanent injunction enjoining further contributory
22 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

23 1661. Plaintiff has incurred costs of suit in connection with bringing this action, and
24 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **ONE HUNDRED EIGHTY-EIGHTH CAUSE OF ACTION**

26 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

27 (against Windermere with respect to KS's infringement)

28 1662. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 1663. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
2 No. 63 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

3 1664. Windermere induced, caused (by way of promotion) and materially contributed to
4 such infringing conduct by KS of the Copyrighted Work No. 63.

5 1665. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
6 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1666. Windermere has profited as a result of Windermere's acts as alleged herein, and
8 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1667. Plaintiff is entitled to a permanent injunction enjoining further contributory
10 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

11 1668. Plaintiff has incurred costs of suit in connection with bringing this action, and
12 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **ONE HUNDRED EIGHTY-NINTH CAUSE OF ACTION**

14 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

15 (against Windermere with respect to KS's infringement)

16 1669. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1670. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
18 No. 64 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

19 1671. Windermere induced, caused (by way of promotion) and materially contributed to
20 such infringing conduct by KS of the Copyrighted Work No. 64.

21 1672. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
22 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1673. Windermere has profited as a result of Windermere's acts as alleged herein, and
24 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1674. Plaintiff is entitled to a permanent injunction enjoining further contributory
26 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

27 1675. Plaintiff has incurred costs of suit in connection with bringing this action, and
28 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED NINETIETH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Windermere with respect to KS's infringement)

1676. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1677. Windermere knew of KS's reproduction and distribution of the Copyrighted Work No. 65 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1678. Windermere induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 65.

1679. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1680. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1681. Plaintiff is entitled to a permanent injunction enjoining further contributory infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1682. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED NINETY-FIRST CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Windermere with respect to KS's infringement)

1683. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1684. Windermere knew of KS's reproduction and distribution of the Copyrighted Work No. 66 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1685. Windermere induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 66.

1686. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1687. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1688. Plaintiff is entitled to a permanent injunction enjoining further contributory
2 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

3 1689. Plaintiff has incurred costs of suit in connection with bringing this action, and
4 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **ONE HUNDRED NINETY-SECOND CAUSE OF ACTION**

6 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

7 (against Windermere with respect to KS's infringement)

8 1690. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1691. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
10 No. 67 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

11 1692. Windermere induced, caused (by way of promotion) and materially contributed to
12 such infringing conduct by KS of the Copyrighted Work No. 67.

13 1693. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
14 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1694. Windermere has profited as a result of Windermere's acts as alleged herein, and
16 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1695. Plaintiff is entitled to a permanent injunction enjoining further contributory
18 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

19 1696. Plaintiff has incurred costs of suit in connection with bringing this action, and
20 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **ONE HUNDRED NINETY-THIRD CAUSE OF ACTION**

22 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

23 (against Windermere with respect to KS's infringement)

24 1697. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1698. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
26 No. 68 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

27 1699. Windermere induced, caused (by way of promotion) and materially contributed to
28 such infringing conduct by KS of the Copyrighted Work No. 68.

1 1700. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1701. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1702. Plaintiff is entitled to a permanent injunction enjoining further contributory
6 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

7 1703. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **ONE HUNDRED NINETY-FORTH CAUSE OF ACTION**

10 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

11 (against Windermere with respect to KS's infringement)

12 1704. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1705. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
14 No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

15 1706. Windermere induced, caused (by way of promotion) and materially contributed to
16 such infringing conduct by KS of the Copyrighted Work No. 69.

17 1707. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
18 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 1708. Windermere has profited as a result of Windermere's acts as alleged herein, and
20 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 1709. Plaintiff is entitled to a permanent injunction enjoining further contributory
22 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

23 1710. Plaintiff has incurred costs of suit in connection with bringing this action, and
24 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **ONE HUNDRED NINETY-FIFTH CAUSE OF ACTION**

26 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

27 (against Windermere with respect to KS's infringement)

28 1711. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 1712. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
2 No. 70 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

3 1713. Windermere induced, caused (by way of promotion) and materially contributed to
4 such infringing conduct by KS of the Copyrighted Work No. 70.

5 1714. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
6 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1715. Windermere has profited as a result of Windermere's acts as alleged herein, and
8 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1716. Plaintiff is entitled to a permanent injunction enjoining further contributory
10 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

11 1717. Plaintiff has incurred costs of suit in connection with bringing this action, and
12 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **ONE HUNDRED NINETY-SIXTH CAUSE OF ACTION**

14 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

15 (against Windermere with respect to KS's infringement)

16 1718. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1719. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
18 No. 71 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

19 1720. Windermere induced, caused (by way of promotion) and materially contributed to
20 such infringing conduct by KS of the Copyrighted Work No. 71.

21 1721. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
22 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1722. Windermere has profited as a result of Windermere's acts as alleged herein, and
24 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1723. Plaintiff is entitled to a permanent injunction enjoining further contributory
26 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

27 1724. Plaintiff has incurred costs of suit in connection with bringing this action, and
28 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED NINETY-SEVENTH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Windermere with respect to KS's infringement)

1725. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1726. Windermere knew of KS's reproduction and distribution of the Copyrighted Work No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1727. Windermere induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 72.

1728. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1729. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1730. Plaintiff is entitled to a permanent injunction enjoining further contributory infringement by Windermere pursuant to 17 U.S.C. § 502(a).

1731. Plaintiff has incurred costs of suit in connection with bringing this action, and Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

ONE HUNDRED NINETY-EIGHTH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Windermere with respect to KS's infringement)

1732. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1733. Windermere knew of KS's reproduction and distribution of the Copyrighted Work No. 73 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1734. Windermere induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 73.

1735. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1736. Windermere has profited as a result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1737. Plaintiff is entitled to a permanent injunction enjoining further contributory
2 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

3 1738. Plaintiff has incurred costs of suit in connection with bringing this action, and
4 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **ONE HUNDRED NINETY-NINTH CAUSE OF ACTION**

6 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

7 (against Windermere with respect to KS's infringement)

8 1739. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1740. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
10 No. 74 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

11 1741. Windermere induced, caused (by way of promotion) and materially contributed to
12 such infringing conduct by KS of the Copyrighted Work No. 74.

13 1742. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
14 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1743. Windermere has profited as a result of Windermere's acts as alleged herein, and
16 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1744. Plaintiff is entitled to a permanent injunction enjoining further contributory
18 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

19 1745. Plaintiff has incurred costs of suit in connection with bringing this action, and
20 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **TWO HUNDREDTH CAUSE OF ACTION**

22 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

23 (against Windermere with respect to KS's infringement)

24 1746. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1747. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
26 No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

27 1748. Windermere induced, caused (by way of promotion) and materially contributed to
28 such infringing conduct by KS of the Copyrighted Work No. 75.

1 1749. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
2 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1750. Windermere has profited as a result of Windermere's acts as alleged herein, and
4 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1751. Plaintiff is entitled to a permanent injunction enjoining further contributory
6 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

7 1752. Plaintiff has incurred costs of suit in connection with bringing this action, and
8 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **TWO HUNDRED FIRST CAUSE OF ACTION**

10 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

11 (against Windermere with respect to KS's infringement)

12 1753. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1754. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
14 No. 76 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

15 1755. Windermere induced, caused (by way of promotion) and materially contributed to
16 such infringing conduct by KS of the Copyrighted Work No. 76.

17 1756. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
18 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 1757. Windermere has profited as a result of Windermere's acts as alleged herein, and
20 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 1758. Plaintiff is entitled to a permanent injunction enjoining further contributory
22 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

23 1759. Plaintiff has incurred costs of suit in connection with bringing this action, and
24 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **TWO HUNDRED SECOND CAUSE OF ACTION**

26 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

27 (against Windermere with respect to KS's infringement)

28 1760. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 1761. Windermere knew of KS's reproduction and distribution of the Copyrighted Work
2 No. 77 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

3 1762. Windermere induced, caused (by way of promotion) and materially contributed to
4 such infringing conduct by KS of the Copyrighted Work No. 77.

5 1763. Plaintiff has sustained actual damages as a result of Windermere's acts as alleged
6 herein, and Windermere is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1764. Windermere has profited as a result of Windermere's acts as alleged herein, and
8 Windermere is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1765. Plaintiff is entitled to a permanent injunction enjoining further contributory
10 infringement by Windermere pursuant to 17 U.S.C. § 502(a).

11 1766. Plaintiff has incurred costs of suit in connection with bringing this action, and
12 Windermere is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **TWO HUNDRED THIRD CAUSE OF ACTION**
14 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

15 (against Ms. Pecnick with respect to KS's infringement)

16 1767. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1768. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
18 No. 28 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

19 1769. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
20 such infringing conduct by KS of the Copyrighted Work No. 28.

21 1770. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
22 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1771. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
24 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1772. Plaintiff is entitled to a permanent injunction enjoining further contributory
26 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

27 1773. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
28 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED FORTH CAUSE OF ACTION
CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Ms. Pecnick with respect to KS's infringement)

1774. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1775. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work No. 29 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1776. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 29.

1777. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1778. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1779. Plaintiff is entitled to a permanent injunction enjoining further contributory infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

1780. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED FIFTH CAUSE OF ACTION
CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Ms. Pecnick with respect to KS's infringement)

1781. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1782. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work No. 30 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1783. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 30.

1784. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1785. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1786. Plaintiff is entitled to a permanent injunction enjoining further contributory
2 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

3 1787. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
4 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **TWO HUNDRED SIXTH CAUSE OF ACTION**
6 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

7 (against Ms. Pecnick with respect to KS's infringement)

8 1788. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1789. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
10 No. 32 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

11 1790. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
12 such infringing conduct by KS of the Copyrighted Work No. 32.

13 1791. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
14 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1792. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
16 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1793. Plaintiff is entitled to a permanent injunction enjoining further contributory
18 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

19 1794. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
20 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **TWO HUNDRED SEVENTH CAUSE OF ACTION**
22 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

23 (against Ms. Pecnick with respect to KS's infringement)

24 1795. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1796. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
26 No. 57 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

27 1797. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
28 such infringing conduct by KS of the Copyrighted Work No. 57.

1 1798. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1799. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
4 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1800. Plaintiff is entitled to a permanent injunction enjoining further contributory
6 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

7 1801. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **TWO HUNDRED EIGHTH CAUSE OF ACTION**

10 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

11 (against Ms. Pecnick with respect to KS's infringement)

12 1802. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1803. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
14 No. 58 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

15 1804. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
16 such infringing conduct by KS of the Copyrighted Work No. 58.

17 1805. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
18 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 1806. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
20 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 1807. Plaintiff is entitled to a permanent injunction enjoining further contributory
22 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

23 1808. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
24 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **TWO HUNDRED NINTH CAUSE OF ACTION**

26 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

27 (against Ms. Pecnick with respect to KS's infringement)

28 1809. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 1810. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
2 No. 60 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

3 1811. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
4 such infringing conduct by KS of the Copyrighted Work No. 60.

5 1812. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
6 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1813. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
8 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1814. Plaintiff is entitled to a permanent injunction enjoining further contributory
10 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

11 1815. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
12 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **TWO HUNDRED TENTH CAUSE OF ACTION**

14 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

15 (against Ms. Pecnick with respect to KS's infringement)

16 1816. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1817. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
18 No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

19 1818. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
20 such infringing conduct by KS of the Copyrighted Work No. 61.

21 1819. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
22 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1820. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
24 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1821. Plaintiff is entitled to a permanent injunction enjoining further contributory
26 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

27 1822. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
28 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED ELEVENTH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Ms. Pecnick with respect to KS's infringement)

1823. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1824. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work No. 62 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1825. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 62.

1826. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1827. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1828. Plaintiff is entitled to a permanent injunction enjoining further contributory infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

1829. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED TWELFTH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Ms. Pecnick with respect to KS's infringement)

1830. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1831. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work No. 63 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1832. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 63.

1833. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1834. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1835. Plaintiff is entitled to a permanent injunction enjoining further contributory
2 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

3 1836. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
4 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **TWO HUNDRED THIRTEENTH CAUSE OF ACTION**

6 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

7 (against Ms. Pecnick with respect to KS's infringement)

8 1837. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1838. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
10 No. 64 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

11 1839. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
12 such infringing conduct by KS of the Copyrighted Work No. 64.

13 1840. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
14 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1841. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
16 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1842. Plaintiff is entitled to a permanent injunction enjoining further contributory
18 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

19 1843. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
20 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **TWO HUNDRED FOURTEENTH CAUSE OF ACTION**

22 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

23 (against Ms. Pecnick with respect to KS's infringement)

24 1844. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1845. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
26 No. 65 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

27 1846. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
28 such infringing conduct by KS of the Copyrighted Work No. 65.

1 1847. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1848. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
4 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1849. Plaintiff is entitled to a permanent injunction enjoining further contributory
6 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

7 1850. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **TWO HUNDRED FIFTEENTH CAUSE OF ACTION**

10 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

11 (against Ms. Pecnick with respect to KS's infringement)

12 1851. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1852. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
14 No. 66 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

15 1853. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
16 such infringing conduct by KS of the Copyrighted Work No. 66.

17 1854. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
18 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 1855. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
20 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 1856. Plaintiff is entitled to a permanent injunction enjoining further contributory
22 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

23 1857. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
24 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **TWO HUNDRED SIXTEENTH CAUSE OF ACTION**

26 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

27 (against Ms. Pecnick with respect to KS's infringement)

28 1858. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 1859. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
2 No. 67 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

3 1860. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
4 such infringing conduct by KS of the Copyrighted Work No. 67.

5 1861. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
6 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1862. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
8 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1863. Plaintiff is entitled to a permanent injunction enjoining further contributory
10 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

11 1864. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
12 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **TWO HUNDRED SEVENTEENTH CAUSE OF ACTION**

14 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

15 (against Ms. Pecnick with respect to KS's infringement)

16 1865. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1866. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
18 No. 68 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

19 1867. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
20 such infringing conduct by KS of the Copyrighted Work No. 68.

21 1868. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
22 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1869. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
24 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1870. Plaintiff is entitled to a permanent injunction enjoining further contributory
26 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

27 1871. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
28 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED EIGHTEENTH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Ms. Pecnick with respect to KS's infringement)

1872. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1873. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work No. 69 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1874. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 69.

1875. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1876. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1877. Plaintiff is entitled to a permanent injunction enjoining further contributory infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

1878. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED NINETEENTH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Ms. Pecnick with respect to KS's infringement)

1879. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1880. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work No. 70 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1881. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 70.

1882. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1883. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1884. Plaintiff is entitled to a permanent injunction enjoining further contributory
2 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

3 1885. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
4 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **TWO HUNDRED TWENTIETH CAUSE OF ACTION**

6 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

7 (against Ms. Pecnick with respect to KS's infringement)

8 1886. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1887. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
10 No. 71 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

11 1888. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
12 such infringing conduct by KS of the Copyrighted Work No. 71.

13 1889. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
14 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

15 1890. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
16 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

17 1891. Plaintiff is entitled to a permanent injunction enjoining further contributory
18 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

19 1892. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
20 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

21 **TWO HUNDRED TWENTY-FIRST CAUSE OF ACTION**

22 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

23 (against Ms. Pecnick with respect to KS's infringement)

24 1893. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

25 1894. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
26 No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

27 1895. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
28 such infringing conduct by KS of the Copyrighted Work No. 72.

1 1896. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
2 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

3 1897. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
4 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

5 1898. Plaintiff is entitled to a permanent injunction enjoining further contributory
6 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

7 1899. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
8 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

9 **TWO HUNDRED TWENTY-SECOND CAUSE OF ACTION**

10 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

11 (against Ms. Pecnick with respect to KS's infringement)

12 1900. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 1901. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
14 No. 73 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

15 1902. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
16 such infringing conduct by KS of the Copyrighted Work No. 73.

17 1903. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
18 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

19 1904. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
20 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

21 1905. Plaintiff is entitled to a permanent injunction enjoining further contributory
22 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

23 1906. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
24 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

25 **TWO HUNDRED TWENTY-THIRD CAUSE OF ACTION**

26 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

27 (against Ms. Pecnick with respect to KS's infringement)

28 1907. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1 1908. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
2 No. 74 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

3 1909. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
4 such infringing conduct by KS of the Copyrighted Work No. 74.

5 1910. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
6 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

7 1911. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
8 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

9 1912. Plaintiff is entitled to a permanent injunction enjoining further contributory
10 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

11 1913. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
12 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

13 **TWO HUNDRED TWENTY-FOURTH CAUSE OF ACTION**

14 **CONTRIBUTORY COPYRIGHT INFRINGEMENT**

15 (against Ms. Pecnick with respect to KS's infringement)

16 1914. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 1915. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work
18 No. 75 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

19 1916. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to
20 such infringing conduct by KS of the Copyrighted Work No. 75.

21 1917. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged
22 herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

23 1918. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and
24 Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1919. Plaintiff is entitled to a permanent injunction enjoining further contributory
26 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

27 1920. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
28 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED TWENTY-FIFTH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Ms. Pecnick with respect to KS's infringement)

1921. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1922. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work No. 76 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1923. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 76.

1924. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1925. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1926. Plaintiff is entitled to a permanent injunction enjoining further contributory infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

1927. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms. Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED TWENTY-SIXTH CAUSE OF ACTION

CONTRIBUTORY COPYRIGHT INFRINGEMENT

(against Ms. Pecnick with respect to KS's infringement)

1928. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1929. Ms. Pecnick knew of KS's reproduction and distribution of the Copyrighted Work No. 77 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106.

1930. Ms. Pecnick induced, caused (by way of promotion) and materially contributed to such infringing conduct by KS of the Copyrighted Work No. 77.

1931. Plaintiff has sustained actual damages as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1932. Ms. Pecnick has profited as a result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 1933. Plaintiff is entitled to a permanent injunction enjoining further contributory
2 infringement by Ms. Pecnick pursuant to 17 U.S.C. § 502(a).

3 1934. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
4 Pecnick is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **TWO HUNDRED TWENTY-SEVENTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against Mr. Shepelev)

8 1935. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 1936. Mr. Shepelev reproduced the Copyrighted Work No. 6 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 1937. Mr. Shepelev distributed the Copyrighted Work No. 6 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 1938. Mr. Shepelev displayed the Copyrighted Work No. 6 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

15 1939. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
16 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
17 504(a)(1).

18 1940. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
19 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

20 1941. Plaintiff is entitled to a permanent injunction enjoining further infringement by
21 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

22 1942. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
23 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

24 **TWO HUNDRED TWENTY-EIGHTH CAUSE OF ACTION**

25 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

26 (against Mr. Shepelev)

27 1943. Plaintiff incorporates, repeats, and realleges every allegation set forth above.
28

1 1944. Mr. Shepelev reproduced the Copyrighted Work No. 28 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

3 1945. Mr. Shepelev distributed the Copyrighted Work No. 28 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

5 1946. Mr. Shepelev displayed the Copyrighted Work No. 28 without authorization in
6 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

7 1947. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
8 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
9 504(a)(1).

10 1948. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
11 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

12 1949. Plaintiff is entitled to a permanent injunction enjoining further infringement by
13 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

14 1950. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
15 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

16 1951.

17 **TWO HUNDRED TWENTY-NINTH CAUSE OF ACTION**

18 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

19 (against Mr. Shepelev)

20 1952. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

21 1953. Mr. Shepelev reproduced the Copyrighted Work No. 29 without authorization in
22 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

23 1954. Mr. Shepelev distributed the Copyrighted Work No. 29 without authorization in
24 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

25 1955. Mr. Shepelev displayed the Copyrighted Work No. 29 without authorization in
26 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 1956. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
2 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
3 504(a)(1).

4 1957. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
5 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

6 1958. Plaintiff is entitled to a permanent injunction enjoining further infringement by
7 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

8 1959. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
9 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

10 **TWO HUNDRED THIRTIETH CAUSE OF ACTION**

11 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

12 (against Mr. Shepelev)

13 1960. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

14 1961. Mr. Shepelev reproduced the Copyrighted Work No. 30 without authorization in
15 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

16 1962. Mr. Shepelev distributed the Copyrighted Work No. 30 without authorization in
17 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

18 1963. Mr. Shepelev displayed the Copyrighted Work No. 30 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

20 1964. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
21 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
22 504(a)(1).

23 1965. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
24 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 1966. Plaintiff is entitled to a permanent injunction enjoining further infringement by
26 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

27 1967. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
28 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED THIRTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

1968. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1969. Mr. Shepelev reproduced the Copyrighted Work No. 31 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1970. Mr. Shepelev distributed the Copyrighted Work No. 31 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1971. Mr. Shepelev displayed the Copyrighted Work No. 31 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1972. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

1973. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1974. Plaintiff is entitled to a permanent injunction enjoining further infringement by Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

1975. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr. Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED THIRTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

1976. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

1977. Mr. Shepelev reproduced the Copyrighted Work No. 32 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

1978. Mr. Shepelev distributed the Copyrighted Work No. 32 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1 1979. Mr. Shepelev displayed the Copyrighted Work No. 32 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

3 1980. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
4 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
5 504(a)(1).

6 1981. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
7 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

8 1982. Plaintiff is entitled to a permanent injunction enjoining further infringement by
9 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

10 1983. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
11 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

12 **TWO HUNDRED THIRTY-THIRD CAUSE OF ACTION**

13 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

14 (against Mr. Shepelev)

15 1984. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

16 1985. Mr. Shepelev reproduced the Copyrighted Work No. 33 without authorization in
17 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

18 1986. Mr. Shepelev distributed the Copyrighted Work No. 33 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

20 1987. Mr. Shepelev displayed the Copyrighted Work No. 33 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

22 1988. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
23 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
24 504(a)(1).

25 1989. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
26 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

27 1990. Plaintiff is entitled to a permanent injunction enjoining further infringement by
28 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

1 1991. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
2 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

3 **TWO HUNDRED THIRTY-FOURTH CAUSE OF ACTION**

4 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

5 (against Mr. Shepelev)

6 1992. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

7 1993. Mr. Shepelev reproduced the Copyrighted Work No. 34 without authorization in
8 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

9 1994. Mr. Shepelev distributed the Copyrighted Work No. 34 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

11 1995. Mr. Shepelev displayed the Copyrighted Work No. 34 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

13 1996. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
14 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
15 504(a)(1).

16 1997. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
17 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

18 1998. Plaintiff is entitled to a permanent injunction enjoining further infringement by
19 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

20 1999. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
21 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

22 **TWO HUNDRED THIRTY-FIFTH CAUSE OF ACTION**

23 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

24 (against Mr. Shepelev)

25 2000. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

26 2001. Mr. Shepelev reproduced the Copyrighted Work No. 35 without authorization in
27 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).
28

1 2002. Mr. Shepelev distributed the Copyrighted Work No. 35 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

3 2003. Mr. Shepelev displayed the Copyrighted Work No. 35 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

5 2004. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
6 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
7 504(a)(1).

8 2005. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
9 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

10 2006. Plaintiff is entitled to a permanent injunction enjoining further infringement by
11 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

12 2007. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
13 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

14 **TWO HUNDRED THIRTY-SIXTH CAUSE OF ACTION**
15 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

16 (against Mr. Shepelev)

17 2008. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

18 2009. Mr. Shepelev reproduced the Copyrighted Work No. 36 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

20 2010. Mr. Shepelev distributed the Copyrighted Work No. 36 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

22 2011. Mr. Shepelev displayed the Copyrighted Work No. 36 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

24 2012. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
25 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
26 504(a)(1).

27 2013. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
28 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 2014. Plaintiff is entitled to a permanent injunction enjoining further infringement by
2 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

3 2015. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
4 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **TWO HUNDRED THIRTY-SEVENTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against Mr. Shepelev)

8 2016. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 2017. Mr. Shepelev reproduced the Copyrighted Work No. 37 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 2018. Mr. Shepelev distributed the Copyrighted Work No. 37 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 2019. Mr. Shepelev displayed the Copyrighted Work No. 37 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

15 2020. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
16 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
17 504(a)(1).

18 2021. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
19 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

20 2022. Plaintiff is entitled to a permanent injunction enjoining further infringement by
21 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

22 2023. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
23 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

24 **TWO HUNDRED THIRTY-EIGHTH CAUSE OF ACTION**

25 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

26 (against Mr. Shepelev)

27 2024. Plaintiff incorporates, repeats, and realleges every allegation set forth above.
28

1 2025. Mr. Shepelev reproduced the Copyrighted Work No. 38 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

3 2026. Mr. Shepelev distributed the Copyrighted Work No. 38 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

5 2027. Mr. Shepelev displayed the Copyrighted Work No. 38 without authorization in
6 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

7 2028. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
8 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
9 504(a)(1).

10 2029. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
11 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

12 2030. Plaintiff is entitled to a permanent injunction enjoining further infringement by
13 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

14 2031. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
15 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

16 **TWO HUNDRED THIRTY-NINTH CAUSE OF ACTION**
17 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

18 (against Mr. Shepelev)

19 2032. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

20 2033. Mr. Shepelev reproduced the Copyrighted Work No. 39 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

22 2034. Mr. Shepelev distributed the Copyrighted Work No. 39 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

24 2035. Mr. Shepelev displayed the Copyrighted Work No. 39 without authorization in
25 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

26 2036. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
27 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
28 504(a)(1).

1 2037. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
2 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

3 2038. Plaintiff is entitled to a permanent injunction enjoining further infringement by
4 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

5 2039. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
6 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

7 **TWO HUNDRED FORTIETH CAUSE OF ACTION**

8 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

9 (against Mr. Shepelev)

10 2040. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

11 2041. Mr. Shepelev reproduced the Copyrighted Work No. 40 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

13 2042. Mr. Shepelev distributed the Copyrighted Work No. 40 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

15 2043. Mr. Shepelev displayed the Copyrighted Work No. 40 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

17 2044. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
18 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
19 504(a)(1).

20 2045. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
21 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

22 2046. Plaintiff is entitled to a permanent injunction enjoining further infringement by
23 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

24 2047. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
25 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED FORTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

2048. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2049. Mr. Shepelev reproduced the Copyrighted Work No. 41 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

2050. Mr. Shepelev distributed the Copyrighted Work No. 41 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

2051. Mr. Shepelev displayed the Copyrighted Work No. 41 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

2052. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

2053. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

2054. Plaintiff is entitled to a permanent injunction enjoining further infringement by Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

2055. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr. Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED FORTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

2056. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2057. Mr. Shepelev reproduced the Copyrighted Work No. 42 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

2058. Mr. Shepelev distributed the Copyrighted Work No. 42 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1 2059. Mr. Shepelev displayed the Copyrighted Work No. 42 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

3 2060. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
4 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
5 504(a)(1).

6 2061. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
7 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

8 2062. Plaintiff is entitled to a permanent injunction enjoining further infringement by
9 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

10 2063. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
11 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

12 **TWO HUNDRED FORTY-THIRD CAUSE OF ACTION**

13 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

14 (against Mr. Shepelev)

15 2064. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

16 2065. Mr. Shepelev reproduced the Copyrighted Work No. 43 without authorization in
17 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

18 2066. Mr. Shepelev distributed the Copyrighted Work No. 43 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

20 2067. Mr. Shepelev displayed the Copyrighted Work No. 43 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

22 2068. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
23 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
24 504(a)(1).

25 2069. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
26 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

27 2070. Plaintiff is entitled to a permanent injunction enjoining further infringement by
28 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

1 2071. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
2 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

3 **TWO HUNDRED FORTY-FOURTH CAUSE OF ACTION**

4 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

5 (against Mr. Shepelev)

6 2072. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

7 2073. Mr. Shepelev reproduced the Copyrighted Work No. 44 without authorization in
8 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

9 2074. Mr. Shepelev distributed the Copyrighted Work No. 44 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

11 2075. Mr. Shepelev displayed the Copyrighted Work No. 44 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

13 2076. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
14 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
15 504(a)(1).

16 2077. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
17 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

18 2078. Plaintiff is entitled to a permanent injunction enjoining further infringement by
19 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

20 2079. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
21 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

22 **TWO HUNDRED FORTY-FIFTH CAUSE OF ACTION**

23 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

24 (against Mr. Shepelev)

25 2080. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

26 2081. Mr. Shepelev reproduced the Copyrighted Work No. 45 without authorization in
27 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).
28

1 2082. Mr. Shepelev distributed the Copyrighted Work No. 45 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

3 2083. Mr. Shepelev displayed the Copyrighted Work No. 45 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

5 2084. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
6 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
7 504(a)(1).

8 2085. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
9 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

10 2086. Plaintiff is entitled to a permanent injunction enjoining further infringement by
11 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

12 2087. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
13 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

14 **TWO HUNDRED FORTY-SIXTH CAUSE OF ACTION**

15 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

16 (against Mr. Shepelev)

17 2088. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

18 2089. Mr. Shepelev reproduced the Copyrighted Work No. 46 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

20 2090. Mr. Shepelev distributed the Copyrighted Work No. 46 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

22 2091. Mr. Shepelev displayed the Copyrighted Work No. 46 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

24 2092. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
25 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
26 504(a)(1).

27 2093. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
28 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 2094. Plaintiff is entitled to a permanent injunction enjoining further infringement by
2 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

3 2095. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
4 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **TWO HUNDRED FORTY-SEVENTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against Mr. Shepelev)

8 2096. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 2097. Mr. Shepelev reproduced the Copyrighted Work No. 47 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 2098. Mr. Shepelev distributed the Copyrighted Work No. 47 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 2099. Mr. Shepelev displayed the Copyrighted Work No. 47 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

15 2100. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
16 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
17 504(a)(1).

18 2101. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
19 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

20 2102. Plaintiff is entitled to a permanent injunction enjoining further infringement by
21 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

22 2103. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
23 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

24 **TWO HUNDRED FORTY-EIGHTH CAUSE OF ACTION**

25 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

26 (against Mr. Shepelev)

27 2104. Plaintiff incorporates, repeats, and realleges every allegation set forth above.
28

1 2105. Mr. Shepelev reproduced the Copyrighted Work No. 48 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

3 2106. Mr. Shepelev distributed the Copyrighted Work No. 48 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

5 2107. Mr. Shepelev displayed the Copyrighted Work No. 48 without authorization in
6 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

7 2108. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
8 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
9 504(a)(1).

10 2109. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
11 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

12 2110. Plaintiff is entitled to a permanent injunction enjoining further infringement by
13 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

14 2111. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
15 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

16 **TWO HUNDRED FORTY-NINTH CAUSE OF ACTION**

17 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

18 (against Mr. Shepelev)

19 2112. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

20 2113. Mr. Shepelev reproduced the Copyrighted Work No. 49 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

22 2114. Mr. Shepelev distributed the Copyrighted Work No. 49 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

24 2115. Mr. Shepelev displayed the Copyrighted Work No. 49 without authorization in
25 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

26 2116. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
27 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
28 504(a)(1).

1 2117. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
2 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

3 2118. Plaintiff is entitled to a permanent injunction enjoining further infringement by
4 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

5 2119. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
6 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

7 **TWO HUNDRED FIFTIETH CAUSE OF ACTION**

8 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

9 (against Mr. Shepelev)

10 2120. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

11 2121. Mr. Shepelev reproduced the Copyrighted Work No. 50 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

13 2122. Mr. Shepelev distributed the Copyrighted Work No. 50 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

15 2123. Mr. Shepelev displayed the Copyrighted Work No. 50 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

17 2124. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
18 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
19 504(a)(1).

20 2125. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
21 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

22 2126. Plaintiff is entitled to a permanent injunction enjoining further infringement by
23 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

24 2127. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
25 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED FIFTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

2128. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2129. Mr. Shepelev reproduced the Copyrighted Work No. 51 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

2130. Mr. Shepelev distributed the Copyrighted Work No. 51 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

2131. Mr. Shepelev displayed the Copyrighted Work No. 51 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

2132. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

2133. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

2134. Plaintiff is entitled to a permanent injunction enjoining further infringement by Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

2135. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr. Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED FIFTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

2136. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2137. Mr. Shepelev reproduced the Copyrighted Work No. 52 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

2138. Mr. Shepelev distributed the Copyrighted Work No. 52 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1 2139. Mr. Shepelev displayed the Copyrighted Work No. 52 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

3 2140. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
4 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
5 504(a)(1).

6 2141. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
7 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

8 2142. Plaintiff is entitled to a permanent injunction enjoining further infringement by
9 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

10 2143. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
11 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

12 **TWO HUNDRED FIFTY-THIRD CAUSE OF ACTION**

13 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

14 (against Mr. Shepelev)

15 2144. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

16 2145. Mr. Shepelev reproduced the Copyrighted Work No. 53 without authorization in
17 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

18 2146. Mr. Shepelev distributed the Copyrighted Work No. 53 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

20 2147. Mr. Shepelev displayed the Copyrighted Work No. 53 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

22 2148. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
23 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
24 504(a)(1).

25 2149. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
26 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

27 2150. Plaintiff is entitled to a permanent injunction enjoining further infringement by
28 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

1 2151. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
2 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

3 **TWO HUNDRED FIFTY-FOURTH CAUSE OF ACTION**

4 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

5 (against Mr. Shepelev)

6 2152. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

7 2153. Mr. Shepelev reproduced the Copyrighted Work No. 54 without authorization in
8 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

9 2154. Mr. Shepelev distributed the Copyrighted Work No. 54 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

11 2155. Mr. Shepelev displayed the Copyrighted Work No. 54 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

13 2156. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
14 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
15 504(a)(1).

16 2157. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
17 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

18 2158. Plaintiff is entitled to a permanent injunction enjoining further infringement by
19 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

20 2159. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
21 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

22 **TWO HUNDRED FIFTY-FIFTH CAUSE OF ACTION**

23 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

24 (against Mr. Shepelev)

25 2160. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

26 2161. Mr. Shepelev reproduced the Copyrighted Work No. 55 without authorization in
27 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).
28

1 2162. Mr. Shepelev distributed the Copyrighted Work No. 55 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

3 2163. Mr. Shepelev displayed the Copyrighted Work No. 55 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

5 2164. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
6 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
7 504(a)(1).

8 2165. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
9 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

10 2166. Plaintiff is entitled to a permanent injunction enjoining further infringement by
11 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

12 2167. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
13 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

14 **TWO HUNDRED FIFTY-SIXTH CAUSE OF ACTION**
15 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

16 (against Mr. Shepelev)

17 2168. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

18 2169. Mr. Shepelev reproduced the Copyrighted Work No. 56 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

20 2170. Mr. Shepelev distributed the Copyrighted Work No. 56 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

22 2171. Mr. Shepelev displayed the Copyrighted Work No. 56 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

24 2172. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
25 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
26 504(a)(1).

27 2173. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
28 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 2174. Plaintiff is entitled to a permanent injunction enjoining further infringement by
2 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

3 2175. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
4 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **TWO HUNDRED FIFTY-SEVENTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against Mr. Shepelev)

8 2176. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 2177. Mr. Shepelev reproduced the Copyrighted Work No. 57 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 2178. Mr. Shepelev distributed the Copyrighted Work No. 57 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 2179. Mr. Shepelev displayed the Copyrighted Work No. 57 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

15 2180. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
16 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
17 504(a)(1).

18 2181. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
19 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

20 2182. Plaintiff is entitled to a permanent injunction enjoining further infringement by
21 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

22 2183. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
23 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

24 **TWO HUNDRED FIFTY-EIGHTH CAUSE OF ACTION**

25 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

26 (against Mr. Shepelev)

27 2184. Plaintiff incorporates, repeats, and realleges every allegation set forth above.
28

1 2185. Mr. Shepelev reproduced the Copyrighted Work No. 58 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

3 2186. Mr. Shepelev distributed the Copyrighted Work No. 58 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

5 2187. Mr. Shepelev displayed the Copyrighted Work No. 58 without authorization in
6 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

7 2188. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
8 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
9 504(a)(1).

10 2189. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
11 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

12 2190. Plaintiff is entitled to a permanent injunction enjoining further infringement by
13 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

14 2191. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
15 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

16 **TWO HUNDRED FIFTY-NINTH CAUSE OF ACTION**

17 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

18 (against Mr. Shepelev)

19 2192. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

20 2193. Mr. Shepelev reproduced the Copyrighted Work No. 59 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

22 2194. Mr. Shepelev distributed the Copyrighted Work No. 59 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

24 2195. Mr. Shepelev displayed the Copyrighted Work No. 59 without authorization in
25 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

1 2196. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
2 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
3 504(a)(1).

4 2197. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
5 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

6 2198. Plaintiff is entitled to a permanent injunction enjoining further infringement by
7 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

8 2199. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
9 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

10 **TWO HUNDRED SIXTIETH CAUSE OF ACTION**

11 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

12 (against Mr. Shepelev)

13 2200. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

14 2201. Mr. Shepelev reproduced the Copyrighted Work No. 60 without authorization in
15 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

16 2202. Mr. Shepelev distributed the Copyrighted Work No. 60 without authorization in
17 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

18 2203. Mr. Shepelev displayed the Copyrighted Work No. 60 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

20 2204. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
21 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
22 504(a)(1).

23 2205. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
24 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

25 2206. Plaintiff is entitled to a permanent injunction enjoining further infringement by
26 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

27 2207. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
28 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED SIXTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

2208. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2209. Mr. Shepelev reproduced the Copyrighted Work No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

2210. Mr. Shepelev distributed the Copyrighted Work No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

2211. Mr. Shepelev displayed the Copyrighted Work No. 61 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

2212. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

2213. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

2214. Plaintiff is entitled to a permanent injunction enjoining further infringement by Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

2215. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr. Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED SIXTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

2216. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2217. Mr. Shepelev reproduced the Copyrighted Work No. 62 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

2218. Mr. Shepelev distributed the Copyrighted Work No. 62 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1 2219. Mr. Shepelev displayed the Copyrighted Work No. 62 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

3 2220. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
4 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
5 504(a)(1).

6 2221. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
7 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

8 2222. Plaintiff is entitled to a permanent injunction enjoining further infringement by
9 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

10 2223. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
11 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

12 **TWO HUNDRED SIXTY-THIRD CAUSE OF ACTION**

13 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

14 (against Mr. Shepelev)

15 2224. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

16 2225. Mr. Shepelev reproduced the Copyrighted Work No. 63 without authorization in
17 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

18 2226. Mr. Shepelev distributed the Copyrighted Work No. 63 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

20 2227. Mr. Shepelev displayed the Copyrighted Work No. 63 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

22 2228. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
23 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
24 504(a)(1).

25 2229. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
26 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

27 2230. Plaintiff is entitled to a permanent injunction enjoining further infringement by
28 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

1 2231. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
2 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

3 **TWO HUNDRED SIXTY-FOURTH CAUSE OF ACTION**

4 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

5 (against Mr. Shepelev)

6 2232. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

7 2233. Mr. Shepelev reproduced the Copyrighted Work No. 64 without authorization in
8 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

9 2234. Mr. Shepelev distributed the Copyrighted Work No. 64 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

11 2235. Mr. Shepelev displayed the Copyrighted Work No. 64 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

13 2236. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
14 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
15 504(a)(1).

16 2237. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
17 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

18 2238. Plaintiff is entitled to a permanent injunction enjoining further infringement by
19 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

20 2239. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
21 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

22 **TWO HUNDRED SIXTY-FIFTH CAUSE OF ACTION**

23 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

24 (against Mr. Shepelev)

25 2240. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

26 2241. Mr. Shepelev reproduced the Copyrighted Work No. 65 without authorization in
27 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).
28

1 2242. Mr. Shepelev distributed the Copyrighted Work No. 65 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

3 2243. Mr. Shepelev displayed the Copyrighted Work No. 65 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

5 2244. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
6 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
7 504(a)(1).

8 2245. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
9 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

10 2246. Plaintiff is entitled to a permanent injunction enjoining further infringement by
11 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

12 2247. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
13 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

14 **TWO HUNDRED SIXTY-SIXTH CAUSE OF ACTION**
15 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

16 (against Mr. Shepelev)

17 2248. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

18 2249. Mr. Shepelev reproduced the Copyrighted Work No. 66 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

20 2250. Mr. Shepelev distributed the Copyrighted Work No. 66 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

22 2251. Mr. Shepelev displayed the Copyrighted Work No. 66 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

24 2252. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
25 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
26 504(a)(1).

27 2253. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
28 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 2254. Plaintiff is entitled to a permanent injunction enjoining further infringement by
2 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

3 2255. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
4 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **TWO HUNDRED SIXTY-SEVENTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against Mr. Shepelev)

8 2256. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 2257. Mr. Shepelev reproduced the Copyrighted Work No. 67 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 2258. Mr. Shepelev distributed the Copyrighted Work No. 67 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 2259. Mr. Shepelev displayed the Copyrighted Work No. 67 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

15 2260. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
16 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
17 504(a)(1).

18 2261. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
19 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

20 2262. Plaintiff is entitled to a permanent injunction enjoining further infringement by
21 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

22 2263. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
23 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

24 **TWO HUNDRED SIXTY-EIGHTH CAUSE OF ACTION**

25 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

26 (against Mr. Shepelev)

27 2264. Plaintiff incorporates, repeats, and realleges every allegation set forth above.
28

1 2265. Mr. Shepelev reproduced the Copyrighted Work No. 68 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

3 2266. Mr. Shepelev distributed the Copyrighted Work No. 68 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

5 2267. Mr. Shepelev displayed the Copyrighted Work No. 68 without authorization in
6 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

7 2268. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
8 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
9 504(a)(1).

10 2269. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
11 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

12 2270. Plaintiff is entitled to a permanent injunction enjoining further infringement by
13 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

14 2271. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
15 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

16 **TWO HUNDRED SIXTY-NINTH CAUSE OF ACTION**

17 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

18 (against Mr. Shepelev)

19 2272. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

20 2273. Mr. Shepelev reproduced the Copyrighted Work No. 69 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

22 2274. Mr. Shepelev distributed the Copyrighted Work No. 69 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

24 2275. Mr. Shepelev displayed the Copyrighted Work No. 69 without authorization in
25 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

26 2276. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
27 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
28 504(a)(1).

1 2277. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
2 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

3 2278. Plaintiff is entitled to a permanent injunction enjoining further infringement by
4 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

5 2279. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
6 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

7 **TWO HUNDRED SEVENTIETH CAUSE OF ACTION**
8 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

9 (against Mr. Shepelev)

10 2280. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

11 2281. Mr. Shepelev reproduced the Copyrighted Work No. 70 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

13 2282. Mr. Shepelev distributed the Copyrighted Work No. 70 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

15 2283. Mr. Shepelev displayed the Copyrighted Work No. 70 without authorization in
16 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

17 2284. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
18 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
19 504(a)(1).

20 2285. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
21 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

22 2286. Plaintiff is entitled to a permanent injunction enjoining further infringement by
23 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

24 2287. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
25 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED SEVENTY-FIRST CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

2288. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2289. Mr. Shepelev reproduced the Copyrighted Work No. 71 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

2290. Mr. Shepelev distributed the Copyrighted Work No. 71 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

2291. Mr. Shepelev displayed the Copyrighted Work No. 71 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

2292. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. § 504(a)(1).

2293. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

2294. Plaintiff is entitled to a permanent injunction enjoining further infringement by Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

2295. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr. Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

TWO HUNDRED SEVENTY-SECOND CAUSE OF ACTION

DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501

(against Mr. Shepelev)

2296. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2297. Mr. Shepelev reproduced the Copyrighted Work No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

2298. Mr. Shepelev distributed the Copyrighted Work No. 72 without authorization in derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

1 2299. Mr. Shepelev displayed the Copyrighted Work No. 72 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

3 2300. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
4 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
5 504(a)(1).

6 2301. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
7 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

8 2302. Plaintiff is entitled to a permanent injunction enjoining further infringement by
9 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

10 2303. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
11 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

12 **TWO HUNDRED SEVENTY-THIRD CAUSE OF ACTION**

13 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

14 (against Mr. Shepelev)

15 2304. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

16 2305. Mr. Shepelev reproduced the Copyrighted Work No. 73 without authorization in
17 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

18 2306. Mr. Shepelev distributed the Copyrighted Work No. 73 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

20 2307. Mr. Shepelev displayed the Copyrighted Work No. 73 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

22 2308. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
23 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
24 504(a)(1).

25 2309. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
26 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

27 2310. Plaintiff is entitled to a permanent injunction enjoining further infringement by
28 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

1 2311. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
2 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

3 **TWO HUNDRED SEVENTY-FOURTH CAUSE OF ACTION**

4 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

5 (against Mr. Shepelev)

6 2312. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

7 2313. Mr. Shepelev reproduced the Copyrighted Work No. 74 without authorization in
8 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

9 2314. Mr. Shepelev distributed the Copyrighted Work No. 74 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

11 2315. Mr. Shepelev displayed the Copyrighted Work No. 74 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

13 2316. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
14 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
15 504(a)(1).

16 2317. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
17 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

18 2318. Plaintiff is entitled to a permanent injunction enjoining further infringement by
19 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

20 2319. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
21 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

22 **TWO HUNDRED SEVENTY-FIFTH CAUSE OF ACTION**

23 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

24 (against Mr. Shepelev)

25 2320. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

26 2321. Mr. Shepelev reproduced the Copyrighted Work No. 75 without authorization in
27 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).
28

1 2322. Mr. Shepelev distributed the Copyrighted Work No. 75 without authorization in
2 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

3 2323. Mr. Shepelev displayed the Copyrighted Work No. 75 without authorization in
4 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

5 2324. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
6 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
7 504(a)(1).

8 2325. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
9 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

10 2326. Plaintiff is entitled to a permanent injunction enjoining further infringement by
11 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

12 2327. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
13 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

14 **TWO HUNDRED SEVENTY-SIXTH CAUSE OF ACTION**

15 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

16 (against Mr. Shepelev)

17 2328. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

18 2329. Mr. Shepelev reproduced the Copyrighted Work No. 76 without authorization in
19 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

20 2330. Mr. Shepelev distributed the Copyrighted Work No. 76 without authorization in
21 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

22 2331. Mr. Shepelev displayed the Copyrighted Work No. 76 without authorization in
23 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

24 2332. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
25 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
26 504(a)(1).

27 2333. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
28 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

1 2334. Plaintiff is entitled to a permanent injunction enjoining further infringement by
2 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

3 2335. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
4 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

5 **TWO HUNDRED SEVENTY-SEVENTH CAUSE OF ACTION**

6 **DIRECT COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. § 501**

7 (against Mr. Shepelev)

8 2336. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

9 2337. Mr. Shepelev reproduced the Copyrighted Work No. 77 without authorization in
10 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(1).

11 2338. Mr. Shepelev distributed the Copyrighted Work No. 77 without authorization in
12 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(3).

13 2339. Mr. Shepelev displayed the Copyrighted Work No. 77 without authorization in
14 derogation of Plaintiff's exclusive rights under 17 U.S.C. § 106(5).

15 2340. Plaintiff has sustained actual damages as a result of Mr. Shepelev's acts as alleged
16 herein, and Mr. Shepelev is liable to Plaintiff for such damages pursuant to 17 U.S.C. §
17 504(a)(1).

18 2341. Mr. Shepelev has profited as a result of Mr. Shepelev's acts as alleged herein, and
19 Mr. Shepelev is liable to Plaintiff for such profits pursuant to 17 U.S.C. § 504(a)(1).

20 2342. Plaintiff is entitled to a permanent injunction enjoining further infringement by
21 Mr. Shepelev pursuant to 17 U.S.C. § 502(a).

22 2343. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
23 Shepelev is liable to Plaintiff for those costs of suit pursuant to 17 U.S.C. § 505.

24 **TWO HUNDRED SEVENTY-EIGHTH CAUSE OF ACTION**

25 **FALSE DESIGNATION OF ORIGIN UNDER 15 U.S.C. § 1125(a)**

26 (against Windermere)

27 2344. Plaintiff incorporates, repeats, and realleges every allegation set forth above.
28

1 2345. Since at least as early as May 2007, Plaintiff has been, and continues to be,
2 engaged in the business of selling access online to works of literary, audiovisual, and visual art
3 with Mr. Ahrens' Marks serving as the designation of origin of those works.

4 2346. Windermere has used Mr. Ahrens' Marks in commerce with respect to
5 Windermere's own provision of online access to works of literary, audiovisual, and visual art
6 ("Windermere's Infringing Use").

7 2347. Windermere's Infringing Use is likely to cause confusion or mistake as to the
8 origin of the services offered thereunder.

9 2348. Windermere's Infringing Use is likely to deceive as to Windermere's affiliation,
10 connection, or association with Mr. Ahrens.

11 2349. Windermere's Infringing Use is likely to deceive as to the origin, sponsorship, or
12 approval by Mr. Ahrens of Windermere's services and commercial activities.

13 2350. Windermere's Infringing Use constitutes a false designation of origin and a false
14 description and representation of Windermere's services, which has damaged and will continue
15 to damage Plaintiff's reputation and goodwill established in connection with Mr. Ahrens' Marks,
16 in violation of § 43(a) of the Lanham Act (15 U.S.C. § 1125(a)).

17 2351. Plaintiff has sustained actual damages as a direct and proximate result of
18 Windermere's Infringing Use, and Windermere is liable to Plaintiff for the amount of those
19 actual damages pursuant to § 35 of the Lanham Act (15 U.S.C. § 1117).

20 2352. Windermere has profited as a direct and proximate result of Windermere's
21 Infringing Use, and Windermere is liable to Plaintiff for the amount of those profits pursuant to §
22 35 of the Lanham Act (15 U.S.C. § 1117).

23 2353. Plaintiff is entitled to permanent injunctive relief against the continuation of
24 Windermere's Infringing Use, pursuant to § 34 of the Lanham Act (15 U.S.C. § 1116).

25 2354. Plaintiff has been required to retain an attorney to prosecute this action, and
26 Windermere is liable to Plaintiff for Plaintiff's attorney fees pursuant to section 35 of the
27 Lanham Act (15 U.S.C. § 1117).

1 2355. Plaintiff has incurred costs of suit in connection with bringing this action, and
2 Windermere is liable to Plaintiff for those costs of suit pursuant to section 35 of the Lanham Act
3 (15 U.S.C. § 1117).

4 **TWO HUNDRED SEVENTY-NINTH CAUSE OF ACTION**
5 **FALSE DESIGNATION OF ORIGIN UNDER 15 U.S.C. § 1125(a)**

6 (against Ms. Pecnick)

7 2356. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

8 2357. Ms. Pecnick has used Mr. Ahrens' Marks in commerce with respect to Ms.
9 Pecnick's own provision of online access to works of literary, audiovisual, and visual art ("Ms.
10 Pecnick's Infringing Use").

11 2358. Ms. Pecnick's Infringing Use is likely to cause confusion or mistake as to the
12 origin of the services offered thereunder.

13 2359. Ms. Pecnick's Infringing Use is likely to deceive as to Ms. Pecnick's affiliation,
14 connection, or association with Mr. Ahrens.

15 2360. Ms. Pecnick's Infringing Use is likely to deceive as to the origin, sponsorship, or
16 approval by Mr. Ahrens of Ms. Pecnick's services and commercial activities.

17 2361. Ms. Pecnick's Infringing Use constitutes a false designation of origin and a false
18 description and representation of Ms. Pecnick's services, which has damaged and will continue
19 to damage Plaintiff's reputation and goodwill established in connection with Mr. Ahrens' Marks,
20 in violation of § 43(a) of the Lanham Act (15 U.S.C. § 1125(a)).

21 2362. Plaintiff has sustained actual damages as a direct and proximate result of Ms.
22 Pecnick's Infringing Use, and Ms. Pecnick is liable to Plaintiff for the amount of those actual
23 damages pursuant to § 35 of the Lanham Act (15 U.S.C. § 1117).

24 2363. Ms. Pecnick has profited as a direct and proximate result of Windermere's
25 Infringing Use, and Ms. Pecnick is liable to Plaintiff for the amount of those profits pursuant to §
26 35 of the Lanham Act (15 U.S.C. § 1117).

27 2364. Plaintiff is entitled to permanent injunctive relief against the continuation of Ms.
28 Pecnick's Infringing Use, pursuant to § 34 of the Lanham Act (15 U.S.C. § 1116).

1 2365. Plaintiff has been required to retain an attorney to prosecute this action, and Ms.
2 Pecnick is liable to Plaintiff for Plaintiff's attorney fees pursuant to section 35 of the Lanham Act
3 (15 U.S.C. § 1117).

4 2366. Plaintiff has incurred costs of suit in connection with bringing this action, and Ms.
5 Pecnick is liable to Plaintiff for those costs of suit pursuant to section 35 of the Lanham Act (15
6 U.S.C. § 1117).

7 **TWO HUNDRED EIGHTIETH CAUSE OF ACTION**
8 **FALSE DESIGNATION OF ORIGIN UNDER 15 U.S.C. § 1125(a)**

9 (against KS)

10 2367. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

11 2368. KS has used Mr. Ahrens' Marks in commerce with respect to KS's own provision
12 of online access to audiovisual works ("KS's Infringing Use").

13 2369. KS's Infringing Use is likely to cause confusion or mistake as to the origin of the
14 services offered thereunder.

15 2370. KS's Infringing Use is likely to deceive as to KS's affiliation, connection, or
16 association with Mr. Ahrens.

17 2371. KS's Infringing Use is likely to deceive as to the origin, sponsorship, or approval
18 by Mr. Ahrens of KS's services and commercial activities.

19 2372. KS's Infringing Use constitutes a false designation of origin and a false
20 description and representation of KS's services, which has damaged and will continue to damage
21 Plaintiff's reputation and goodwill established in connection with Mr. Ahrens' Marks, in
22 violation of § 43(a) of the Lanham Act (15 U.S.C. § 1125(a)).

23 2373. Plaintiff has sustained actual damages as a direct and proximate result of KS's
24 Infringing Use, and KS is liable to Plaintiff for the amount of those actual damages pursuant to §
25 35 of the Lanham Act (15 U.S.C. § 1117).

26 2374. KS has profited as a direct and proximate result of KS's Infringing Use, and KS is
27 liable to Plaintiff for the amount of those profits pursuant to § 35 of the Lanham Act (15 U.S.C. §
28 1117).

1 2375. Plaintiff is entitled to permanent injunctive relief against the continuation of KS's
2 Infringing Use, pursuant to § 34 of the Lanham Act (15 U.S.C. § 1116).

3 2376. Plaintiff has been required to retain an attorney to prosecute this action, and KS is
4 liable to Plaintiff for Plaintiff's attorney fees pursuant to section 35 of the Lanham Act (15
5 U.S.C. § 1117).

6 2377. Plaintiff has incurred costs of suit in connection with bringing this action, and KS
7 is liable to Plaintiff for those costs of suit pursuant to section 35 of the Lanham Act (15 U.S.C. §
8 1117).

9 **TWO HUNDRED EIGHTY-FIRST CAUSE OF ACTION**
10 **FALSE DESIGNATION OF ORIGIN UNDER 15 U.S.C. § 1125(a)**

11 (against Mr. Shepelev)

12 2378. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

13 2379. Mr. Shepelev has used Mr. Ahrens' Marks in commerce with respect to Mr.
14 Shepelev's own provision of online access to works of visual art ("Mr. Shepelev's Infringing
15 Use").

16 2380. Mr. Shepelev's Infringing Use is likely to cause confusion or mistake as to the
17 origin of the services offered thereunder.

18 2381. Mr. Shepelev's Infringing Use is likely to deceive as to Mr. Shepelev's affiliation,
19 connection, or association with Mr. Ahrens.

20 2382. Mr. Shepelev's Infringing Use is likely to deceive as to the origin, sponsorship, or
21 approval by Mr. Ahrens of Mr. Shepelev's services and commercial activities.

22 2383. Mr. Shepelev's Infringing Use constitutes a false designation of origin and a false
23 description and representation of Mr. Shepelev's services, which has damaged and will continue
24 to damage Plaintiff's reputation and goodwill established in connection with Mr. Ahrens' Marks,
25 in violation of § 43(a) of the Lanham Act (15 U.S.C. § 1125(a)).

26 2384. Plaintiff has sustained actual damages as a direct and proximate result of Mr.
27 Shepelev's Infringing Use, and Mr. Shepelev is liable to Plaintiff for the amount of those actual
28 damages pursuant to § 35 of the Lanham Act (15 U.S.C. § 1117).

1 2385. Mr. Shepelev has profited as a direct and proximate result of Mr. Shepelev's
2 Infringing Use, and Mr. Shepelev is liable to Plaintiff for the amount of those profits pursuant to
3 § 35 of the Lanham Act (15 U.S.C. § 1117).

4 2386. Plaintiff is entitled to permanent injunctive relief against the continuation of Mr.
5 Shepelev's Infringing Use, pursuant to § 34 of the Lanham Act (15 U.S.C. § 1116).

6 2387. Plaintiff has been required to retain an attorney to prosecute this action, and Mr.
7 Shepelev is liable to Plaintiff for Plaintiff's attorney fees pursuant to section 35 of the Lanham
8 Act (15 U.S.C. § 1117).

9 2388. Plaintiff has incurred costs of suit in connection with bringing this action, and Mr.
10 Shepelev is liable to Plaintiff for those costs of suit pursuant to section 35 of the Lanham Act (15
11 U.S.C. § 1117).

12 **TWO HUNDRED EIGHTY-SECOND CAUSE OF ACTION**
13 **MISAPPROPRIATION OF COMMERCIAL PROPERTIES UNDER**
14 **NEVADA COMMON LAW**

15 (against Windermere)

16 2389. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

17 2390. Plaintiff has invested significant time, effort, and money in developing the
18 images, text, and other content constituting Mr. Ahrens' Commercial Properties.

19 2391. Mr. Ahrens' Commercial Properties are of actual and potential commercial value
20 to Plaintiff.

21 2392. Windermere's wrongful use of Mr. Ahrens' Commercial Properties, undertaken
22 without authority from Plaintiff, deprived Plaintiff, at least in part, of the full commercial value
23 of Mr. Ahrens' Commercial Properties.

24 2393. Plaintiff has sustained damages as a direct and proximate result of Windermere's
25 acts as alleged herein, and Windermere is liable to Plaintiff for such damages.

TWO HUNDRED EIGHTY-THIRD CAUSE OF ACTION
MISAPPROPRIATION OF COMMERCIAL PROPERTIES UNDER
NEVADA COMMON LAW

(against Ms. Pecnick)

2394. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2395. Plaintiff has invested significant time, effort, and money in developing the images, text, and other content constituting Mr. Ahrens' Commercial Properties.

2396. Mr. Ahrens' Commercial Properties are of actual and potential commercial value to Plaintiff.

2397. Ms. Pecnick's wrongful use of Mr. Ahrens' Commercial Properties, undertaken without authority from Plaintiff, deprived Plaintiff, at least in part, of the full commercial value of Mr. Ahrens' Commercial Properties.

2398. Plaintiff has sustained damages as a direct and proximate result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages.

TWO HUNDRED EIGHTY-FOURTH CAUSE OF ACTION
MISAPPROPRIATION OF COMMERCIAL PROPERTIES UNDER
NEVADA COMMON LAW

(against KS)

2399. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2400. Plaintiff has invested significant time, effort, and money in developing the images, text, and other content constituting Mr. Ahrens' Commercial Properties.

2401. Mr. Ahrens' Commercial Properties are of actual and potential commercial value to Plaintiff.

2402. KS's wrongful use of Mr. Ahrens' Commercial Properties, undertaken without authority from Plaintiff, deprived Plaintiff, at least in part, of the full commercial value of Mr. Ahrens' Commercial Properties.

2403. Plaintiff has sustained damages as a direct and proximate result of KS's acts as alleged herein, and KS is liable to Plaintiff for such damages.

TWO HUNDRED EIGHTY-FIFTH CAUSE OF ACTION
MISAPPROPRIATION OF COMMERCIAL PROPERTIES UNDER
NEVADA COMMON LAW

(against Mr. Shepelev)

2404. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2405. Plaintiff has invested significant time, effort, and money in developing the images, text, and other content constituting Mr. Ahrens' Commercial Properties.

2406. Mr. Ahrens' Commercial Properties are of actual and potential commercial value to Plaintiff.

2407. Mr. Shepelev's wrongful use of Mr. Ahrens' Commercial Properties, undertaken without authority from Plaintiff, deprived Plaintiff, at least in part, of the full commercial value of Mr. Ahrens' Commercial Properties.

2408. Plaintiff has sustained damages as a direct and proximate result of Mr. Shepelev's acts as alleged herein, and Mr. Shepelev is liable to Plaintiff for such damages.

TWO HUNDRED EIGHTY-SIXTH CAUSE OF ACTION
UNJUST ENRICHMENT UNDER NEVADA COMMON LAW

(against Windermere)

2409. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2410. Windermere benefited from the infringement and misappropriation of Mr. Ahrens' Intellectual Property.

2411. Windermere retained such benefits at the expense of Plaintiff.

2412. The benefit retained by Windermere in equity and good conscience belonged to Plaintiff.

2413. Plaintiff has sustained damages as a direct and proximate result of Windermere's acts as alleged herein, and Windermere is liable to Plaintiff for such damages.

TWO HUNDRED EIGHTY-SEVENTH CAUSE OF ACTION

UNJUST ENRICHMENT UNDER NEVADA COMMON LAW

(against Ms. Pecnick)

2414. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2415. Ms. Pecnick benefited from the infringement and misappropriation of Mr. Ahrens' Intellectual Property.

2416. Ms. Pecnick retained such benefits at the expense of Plaintiff.

2417. The benefit retained by Ms. Pecnick in equity and good conscience belonged to Plaintiff.

2418. Plaintiff has sustained damages as a direct and proximate result of Ms. Pecnick's acts as alleged herein, and Ms. Pecnick is liable to Plaintiff for such damages.

TWO HUNDRED EIGHTY-EIGHTH CAUSE OF ACTION

UNJUST ENRICHMENT UNDER NEVADA COMMON LAW

(against KS)

2419. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2420. KS benefited from the infringement and misappropriation of Mr. Ahrens' Intellectual Property.

2421. KS retained such benefits at the expense of Plaintiff.

2422. The benefit retained by KS in equity and good conscience belonged to Plaintiff.

2423. Plaintiff has sustained damages as a direct and proximate result of KS' acts as alleged herein, and KS is liable to Plaintiff for such damages.

TWO HUNDRED EIGHTY-NINTH CAUSE OF ACTION

UNJUST ENRICHMENT UNDER NEVADA COMMON LAW

(against Mr. Shepelev)

2424. Plaintiff incorporates, repeats, and realleges every allegation set forth above.

2425. Mr. Shepelev benefited from the infringement and misappropriation of Mr. Ahrens' Intellectual Property.

2426. Mr. Shepelev retained such benefits at the expense of Plaintiff.

- 1 l. For actual damages for the misappropriation by Ms. Pecnick of Mr. Ahrens’
2 Commercial Properties;
- 3 m. For actual damages for the misappropriation by KS of Mr. Ahrens’ Commercial
4 Properties;
- 5 n. For actual damages for the misappropriation by Mr. Shepelev of Mr. Ahrens’
6 Commercial Properties;
- 7 o. For equitable relief for the unjust enrichment of Windermere at the expense of
8 Mr. Ahrens, in the form of disgorgement of profits and a permanent injunction;
- 9 p. For equitable relief for the unjust enrichment of Ms. Pecnick at the expense of Mr.
10 Ahrens, in the form of disgorgement of profits and a permanent injunction;
- 11 q. For equitable relief for the unjust enrichment of KS at the expense of Mr. Ahrens,
12 in the form of disgorgement of profits and a permanent injunction;
- 13 r. For equitable relief for the unjust enrichment of Mr. Shepelev at the expense of
14 Mr. Ahrens, in the form of disgorgement of profits and a permanent injunction;
- 15 s. For permanent injunctive relief against Windermere prohibiting Windermere’s
16 further infringement of Mr. Ahrens’ Copyrights and Mr. Ahrens’ Marks and
17 further misappropriation of Mr. Ahrens’ Commercial Properties;
- 18 t. For permanent injunctive relief against Ms. Pecnick prohibiting Ms. Pecnick’s
19 further infringement of Mr. Ahrens’ Copyrights and Mr. Ahrens’ Marks and
20 further misappropriation of Mr. Ahrens’ Commercial Properties;
- 21 u. For permanent injunctive relief against KS prohibiting KS’s infringement of Mr.
22 Ahrens’ Copyrights and Mr. Ahrens’ Marks and further misappropriation of Mr.
23 Ahrens’ Commercial Properties;
- 24 v. For permanent injunctive relief against Mr. Shepelev prohibiting Mr. Shepelev’s
25 further infringement of Mr. Ahrens’ Copyrights and Mr. Ahrens’ Marks and
26 further misappropriation of Mr. Ahrens’ Commercial Properties;
- 27 w. For attorneys’ fees and costs of suit incurred herein as allowed by law and rule of
28 Court;

1 x. For any other relief this Court may deem proper.

2 **DEMAND FOR JURY TRIAL**

3 Plaintiff hereby requests trial by jury on all causes of action so triable set forth in this
4 Complaint.

5 Respectfully submitted this _____ day of October, 2015.

6 GIBSON & TREU LLP

7 By /s/ J.D. Lowry.

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